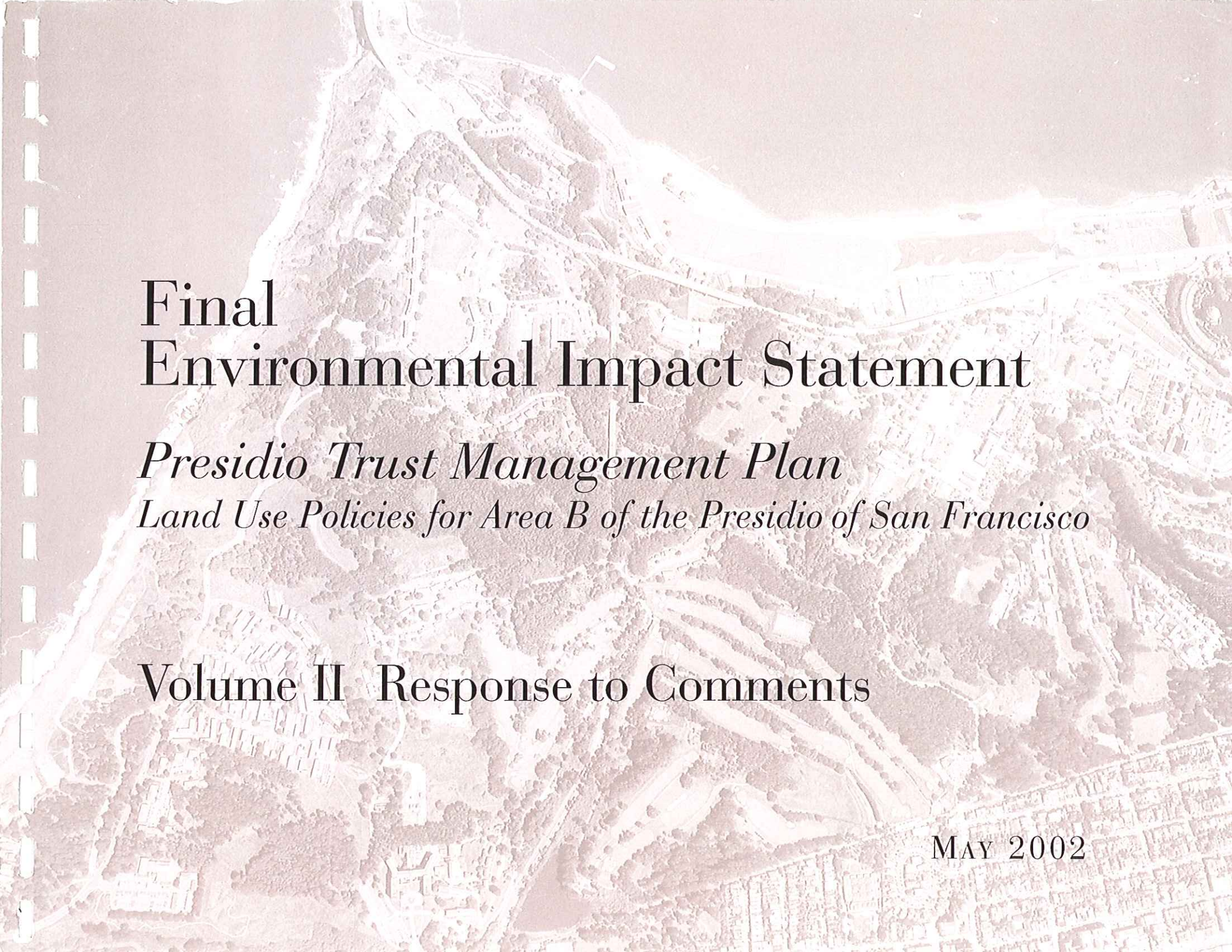


Final Environmental Impact Statement

Presidio Trust Management Plan

Land Use Policies for Area B of the Presidio of San Francisco

Volume II Response to Comments

May 2002

As part of the Golden Gate National Recreation Area, the Presidio's significant natural, historic, scenic, cultural and recreational resources must be managed in a manner which is consistent with sound principles of land use planning and management, and which protects the Presidio from development and uses which would destroy the scenic beauty and historic and natural character of the area and cultural and recreational resources.

- From the Presidio Trust Act (P.L. 104-333).

PRESIDIO TRUST MANAGEMENT PLAN (PTMP): LAND USE POLICIES FOR AREA B OF THE PRESIDIO OF SAN FRANCISCO FINAL ENVIRONMENTAL IMPACT STATEMENT

San Francisco, California

The Presidio Trust Management Plan (PTMP) Final Environmental Impact Statement (EIS) is comprised of three volumes, each bound under separate cover: the EIS (Volume I), Responses to Comments (Volume II), and the Appendices (Volume III). This is Volume II. (See below for contents of all three volumes.) The Presidio Trust is the Lead Agency and project proponent. This Final EIS and corresponding Final Plan (PTMP) represent the culmination of a two-year public planning and environmental review process.

This Final EIS describes and analyzes alternatives for updating update the General Management Plan Amendment (GMPA) adopted in 1994 by the National Park Service (NPS) for the area of the Presidio of San Francisco now under the jurisdiction of the Presidio Trust (Area B). The proposed action (Final Plan) and five additional alternatives have been assessed along with a variant of the Final Plan Alternative developed in response to public comment on the Draft Plan and Draft EIS.

Under the 1996 Trust Act, as amended, Congress created the Trust to preserve and enhance the cultural, natural, scenic, and recreational resources of the Presidio for public use while ensuring that the park becomes financially self-sufficient with respect to both annual operations and long-term needs. Each of the alternatives presented in this EIS achieves this differently and has a different emphasis. Principal differences include the proposed total building square footage, the proposed amount of non-residential and residential uses, the amount of open space and the method of delivery of public programs. The maximum overall square footage of 5,960,000 allowed under the Trust Act would not be exceeded under any alternative.

Major impact topics assessed in this EIS include historic resources, cultural landscape, archaeology, biological resources, water resources, visual resources, air quality, noise, land use, socioeconomic issues, visitor experience, recreation, public safety, transportation, water supply, utilities, and Trust operations. Mitigation measures are included to reduce impacts identified in many of these topic areas.

No decision on the Final Plan will be made or recorded until at least 30 days after the publication of notice by the U.S. Environmental Protection Agency (EPA) in the Federal Register that this Final EIS has been filed with the EPA. For further information about this document or the NEPA process, please contact the Trust in writing at 34 Graham Street, P.O. Box 29052, San Francisco, CA 94129-0052 or by telephone at 415/561-5300. Copies of all three volumes of the Final EIS and the Final Plan are available at the Trust library (34 Graham Street), on the Trust website at www.presidiotrust.gov and in local libraries.

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LIST OF ACRONYMS

ABAG	Association of Bay Area Governments
ACHP	Advisory Council on Historic Preservation
ALPs	Airport Layout Plans
AMP	Archeological Management Plan
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
BCDC	Bay Conservation and Development Commission
BMPs	Best Management Practices
Caltrans	California Department of Transportation
CAP	Clean Air Plan
CBD	Central Business District
CCSF	City and County of San Francisco
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response Compensation and Liability Act
CHNA	Cow Hollow Neighbors in Action
CMP	Comprehensive Management Program
CO	carbon monoxide
CSOs	combined sewer overflows
DHS	California State Department of Health Services
DOI	Department of the Interior
EA	Environmental Assessment
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
ESA	Endangered Species Act
FHWA	Federal Highway Administration
FONSI	Finding of No Significant Impact
FY	Fiscal Year
GAO	General Accounting Office
GGBHTD	Golden Gate Bridge Highway and Transportation District
GGNPA	Golden Gate National Parks Association
GGNRA	Golden Gate National Recreation Area
GGNRA Act	Golden Gate National Recreation Area Act
GGT	Golden Gate Transit
GMPA	General Management Plan Amendment
gpd	gallons per day
GSA	General Services Administration
HABS	Historic American Buildings Survey
HDPE	high density polyethylene
HUD	U.S. Department of Housing and Urban Development
IMPROVE	Interagency Monitoring of Protected Visual Environments
IPM	Integrated Pest Management
ISCOTT	Interdepartmental Staff Committee on Traffic and Transportation
JCC	Jewish Community Center
LAIR	Letterman Army Institute of Research
LAMC	Letterman Army Medical Center
LDAC	Letterman Digital Arts Center
LOS	levels of service
mgd	million gallons per day
MLP	Maximum Load Points
MUNI	Municipal Railway System
NAC	Noise Abatement Criteria
NAPP	Neighborhood Associations for Presidio Planning
NEPA	National Environmental Policy Act
NHLD	National Historic Landmark District
NHPA	National Historic Preservation Act
NNN	triple net
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
PAR	Planning Association for the Richmond
PHRA	Pacific Heights Residents Association
PHSH	Public Health Services Hospital
PTIP	Presidio Trust Implementation Plan
PTMP	Presidio Trust Management Plan

RESPONSE TO COMMENTS

List of Acronyms

PWB	Presidio Water Balance
RAB	Restoration Advisory Board
RFQ	Request for Qualifications
ROD	Record of Decision
RPP	Residential Parking Program
RV	Recreational Vehicle
RWQCB	Regional Water Quality Control Board
SDC	Service District Charge
SEWPCP	Southeast Water Pollution Control Plant
sf	square feet
SFCTA	San Francisco County Transportation Authority
SHPO	California State Historic Preservation Officer
SMZ	Special Management Zone
SOI	Secretary of the Interior
SPUG	Special Uses Group
SPUR	San Francisco Planning and Urban Research Association
SWPPP	Stormwater Pollution Prevention Plan
TCMs	Transportation Control Measures
TDM	Transportation Demand Management
UC	University of California
USFWS	U.S. Fish and Wildlife Service
USPP	U.S. Park Police
VMP	Vegetation Management Plan

1. INTRODUCTION

1. INTRODUCTION

This is Volume II of the Final Environmental Impact Statement (Final EIS) regarding the proposed management plan for areas of the Presidio of San Francisco (Presidio) under Presidio Trust (Trust) jurisdiction. The Final EIS supplements the Final General Management Plan Amendment Environmental Impact Statement (GMPA EIS) adopted in 1994 by the National Park Service (NPS) for the Presidio. The Final EIS is prepared in compliance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) implementing regulations at 40 CFR Parts 1500-1508, and the Trust's own supplemental implementing regulations in 36 CFR Part 1010. Volume II contains a summary of the public and agency comments received on the Draft EIS, along with written responses to those comments. Volume I is the Final EIS. Volume III contains technical appendices related to and supplementing the Final EIS analyses in Volume I.

The Draft Presidio Trust Implementation Plan (Draft Plan or PTIP) and Draft EIS were circulated for public and agency review from July 25, 2001 to October 25, 2001, a period of 90 days. During this period, the Trust received over 3,000 comment letters, as well as oral comments provided at two public hearings, and at a public meeting of the Golden Gate National Recreation Area (GGNRA) Citizens' Advisory Commission. Original comment letters and transcripts are available for review at the Presidio Trust library, 34 Graham Street, in the Presidio.

The Trust carefully considered public comments, and made modifications to the text of the Draft Plan and Draft EIS as a result of those comments. Modifications included re-naming and revising elements of the Draft Plan, inclusion of a variant of that plan in the Final EIS and other modest adjustments to the text and analysis of the Final EIS. These changes are summarized in this introduction and explained further within the responses to comments included in Volume II of the Final EIS.

Following distribution of the Final EIS, and following the 30-day "no action" period required under NEPA, the Trust Board of Directors will consider adoption of a final plan. The Board's action could include, but is not limited to, adoption of the preferred alternative (the Final Plan), rejection of all alternatives, and/or partial or conditional approval of a particular alternative. The Board's action, through a Record of Decision, will describe the scope and basis of the decision, the mitigations or conditions upon which it is contingent, and how the Final EIS will be used in subsequent decision making.

What follows is a summary of changes to the Plan itself (Section 1.1), followed by a summary of changes made in the Final EIS in response to public and agency comments on the Draft EIS (Section 1.2).

1.1 CHANGES TO THE PLAN

In response to public input, the Trust's preferred plan (Final Plan or Plan) has been renamed and reorganized. Now titled The Presidio Trust Management Plan: Land Use Policies for Area B of the Presidio of San Francisco, the revised document more clearly articulates its intended role as a general planning or policy framework that will be used to guide future, more specific planning and implementation decisions. Two salient facts must be borne in mind in reviewing and evaluating the Final Plan: (1) it will reduce development – shown as the square footage of buildings – to significantly less than the status quo; and (2) it will increase open space to substantially more than the status quo. Thus, the Final Plan removes development rather than fostering it. Changes in the Final Plan are summarized below.

1.1.1 VISION AND PLAN ORGANIZATION

The Final Plan document has been reorganized and many sections rewritten to provide greater clarity. Preservation of the Presidio's cultural, natural, scenic and recreational resources for public use is articulated clearly as the cornerstone of the Plan, and therefore its "vision." The preface, vision statement, summary, and introduction section of the Draft Plan have been combined and shortened into the "Overview" of the Final Plan.

Planning principles presented in Chapter 2 of the Draft Plan have been retained in what is now Chapter One of the Final Plan, or included within the land use, transportation, and infrastructure discussions in Chapter Two. The discussion of park programs originally presented in Chapter 3 of the Draft

Plan has been modified in response to comments and is now within the discussion of bringing people to the park in Chapter One of the Final Plan and the discussion of public land uses in Chapter Two of the Final Plan. Planning guidelines originally in Chapter 4 of the Draft Plan remain essentially unchanged in Chapter Three of the Final Plan. Implementation strategies originally in Chapter 5 of the Draft Plan have been updated and clarified in what is now Chapter Four of the Final Plan, which now more clearly articulates procedures for ensuring public input regarding future planning and decision making.

Draft Plan (PTIP) Section	Location in Final Plan (PTMP)
Executive Summary, Vision Statement, Plan Summary, Chapter 1 – Introduction	Overview, Appendix B (Plan Background)
Chapter 2 – Planning Principles	Chapter One: Preserving and Enhancing Park Resources; Chapter Two: Park Land Uses, Transportation, and Infrastructure
Chapter 3 – Programs	Chapter One ("Bringing People to the Park" section); Chapter Two – (public use discussion)
Chapter 4 – Planning Districts: Concepts & Guidelines	Chapter Three – Planning Districts: Concepts and Guidelines
Chapter 5 – Implementation Strategy	Chapter Four – Plan Implementation

1.1.2 CULTURAL AND NATURAL RESOURCES

The Trust's commitment to preserve the Presidio National Historic Landmark District (NHLD or NHL District) has been strengthened in the Final Plan, and cultural resources have new prominence at the start of Chapter One. The text has also been modified to reflect execution of a Programmatic Agreement (PA) regarding compliance with the National Historic Preservation Act (NHPA). This agreement was signed in early 2002 by the Trust, the NPS, the California State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation (ACHP), and two non-profit historic preservation organizations. A copy of the PA is included in Volume III of the Final EIS, Appendix D.

The Final Plan also discusses an agreement between the Trust, the NPS, and the Golden Gate National Parks Association (GGNPA) to study potential expansion of Crissy Marsh, and contains commitments that will avoid foreclosing potential expansion options for the duration of the study. Restoration of the Tennessee Hollow riparian corridor remains a clear focus of the Plan's natural resources goals, and changes in land use or open space designations have been made to articulate the goal of restoring native plant communities immediately behind the Public Health Service Hospital (PHSH) and in the portion of the West Washington neighborhood where housing is proposed for removal.

1.1.3 HOUSING AND LODGING

In response to comments requesting greater specificity with regard to housing and lodging, the discussions of these issues have been clarified and additional detail provided. A map and numeric summary articulates where the Final Plan expects housing to be retained or removed, and instances where it may be converted to other uses or replaced. Where the precise number of residential accommodations provided in an area or provided via one means of replacement versus another cannot be determined with specificity, a generalized range is articulated. Quantitative, qualitative, and procedural constraints are provided for new residential construction, and the "no net loss" of housing policy described in the Draft Plan has been moderated along the lines suggested by several commentors such that the existing number of residential accommodations represents the maximum limit and not a goal.

A map in the Final Plan also shows preferred locations for lodging, and the text clarifies the Trust's intention to reuse and rehabilitate historic buildings to provide lodging. The Plan clarifies that new construction associated with lodging will take the form of building additions or annexes that make the associated reuse of historic buildings functionally and financially feasible. In response to public comments, the maximum amount of potential new construction in the Crissy Field (Area B) planning district has been reduced from the number proposed in the Draft Plan.

1.1.4 BUILT SPACE AND NEW CONSTRUCTION

The Final Plan's square footage reduction goal has been revised to be a commitment to reduce existing built space from 5.96 million square feet to 5.6 million square feet or less over time. The role of new construction was also clarified in the Final Plan to state that non-residential construction would be primarily used to facilitate the effective rehabilitation and reuse of historic buildings, with limited additional replacement construction to be used to meet other Plan goals.

1.1.5 CULTURAL AND EDUCATIONAL PROGRAMS

The Trust's commitment to high quality programming for park visitors remains in place, and is articulated in Chapter One of the Final Plan. Chapter Two of the Final Plan breaks out the discussion of cultural programs from educational uses to provide greater specifics than were available in the Draft Plan regarding the use of building space for public uses. Clarification is also provided regarding the delivery of programs. The Plan's goal is to facilitate delivery of high quality programs by the NPS, the Trust, tenants, and other partners with expertise in program delivery. In response to comments, the Draft Plan's assumption of $10 million annually to park programming has been reduced to a more modest goal ($2 million, increasing to $5 million over time), and the related goal of attracting funding for programs from philanthropic and other outside sources is clearly articulated.

1.1.6 FUTURE PLANNING AND DECISION MAKING

In response to general confusion expressed in comments regarding the role of additional planning and public input in future Trust decisions, the Final Plan clarifies these issues. Chapter Four of the Final Plan summarizes previous and ongoing implementation actions, and provides specific examples regarding the near-term planning and implementation activities that the Trust expects to undertake once the Final Plan is adopted. Because implementation activities that will be undertaken many years from now cannot be described in any detail, a generalized implementation timeline is provided, along with a discussion of overall priorities and strategy.

Before many future implementation activities are undertaken, they will often involve additional planning, environmental analysis, and public input. The nature of additional process is identified for specific classes of activities. For example, the Final Plan specifies that all new construction – beyond minor building additions – will require public input and agency consultation pursuant to NEPA and the NHPA, and summarizes what that will involve.

1.2 CHANGES TO THE EIS

In response to public comment and changes made to the Final Plan, the Final EIS was also revised as summarized below.

1.2.1 ALTERNATIVES

The Final Plan alternative has been modified to reflect changes from the Draft Plan, including the reallocation of some potential new building square footage from Crissy Field (Area B) to the Letterman district, and the re-designation of certain areas for restoration as native plant communities in the South Hills district. Land use assumptions have also been revised to reflect the potential location of infrastructure (e.g., a recycled water plant) in the Letterman district, and the potential location of Golden Gate Bridge maintenance facilities in the Fort Scott district.

At the request of commentors who suggested that a variety of new alternatives be analyzed, the responses to comments clarify the spectrum of alternatives captured within the range included in the Draft EIS, and the Final EIS incorporates a variant to the Final Plan Alternative. Designed to be as consistent as possible with a detailed Sierra Club proposal, the Final Plan Variant is more aggressive than the Final Plan Alternative with respect to building demolition, emphasizes the replacement of removed housing units within existing buildings, and provides for no new construction (i.e., none of the removed building space can be replaced).

A few land use assumptions associated with the No Action Alternative (GMPA 2000) have been corrected to reflect cultural/educational rather than office use of about 220,000 square feet in the Main Post planning district, reflecting the 1994 GMPA's identification of the Montgomery Street Barracks as the location of these kinds of uses.

1.2.2 ANALYSIS METHODOLOGIES AND ENVIRONMENTAL CONSEQUENCES

Analysis methodologies associated with the assessment of parking demand, visitation, and utilities were revised to provide more reasonable predictions of future conditions. In response to comments on parking issues, the Trust re-evaluated and modified methodology related to calculation of parking demand and adjusted proposed parking supply for all alternatives but Minimum Management. Specifically, assumptions associated with the Letterman Digital Arts Center (LDAC) project were revised to be consistent with the Letterman Complex Final EIS, adjustments were made to better reflect average demand for each planning district, and the demand associated with new residential units was adjusted downward to reflect the smaller size of future units. Other parts of the transportation analysis were also updated to use assumptions consistent with the Letterman Complex Final EIS, and to incorporate the minor adjustments in land use assumptions described above. The results of the transportation analysis were then used to inform adjustments to the air quality and noise environmental impacts analyses. These EIS sections were also modified in response to comments to include carbon monoxide modeling of an additional traffic intersection, and to provide additional background information on the Clean Air Act and noise sensitive areas. None of the changes provided significant new information, resulted in significant new impacts, or substantially increased the severity of an impact that was already identified in the Draft EIS.

The same is true with regard to changes in the visitation and utilities analyses in the Final EIS. In response to public comment, the proposed "cultural/educational" uses were separated and the visitor methodology updated as described in Response VE-1 and Section 4.4.4 of the Final EIS. In estimating visitorship, further clarity was provided by reporting park visitors, instead of all "visitor trips," which include those associated with residences and office uses. In the utilities analysis, clarifications made in response to public requests include an expanded discussion of projected water demand and supply and additional quantification of effects related to wastewater. The analysis in Section 4.2.1, (Historic Architectural Resources and the Cultural Landscape), was also expanded in response to public comment.

1.2.3 FINANCIAL ANALYSIS

The financial appendix presented in the Draft EIS has been updated and expanded to include a number of sensitivity analyses. The updates reflect factual information that has become known or final since the distribution of the Draft EIS, including terms of the agreement with Letterman Digital Arts, Ltd., and Fiscal Year 2001 and 2002 budget figures (expenses and projected revenues). Updates also address changes to the alternatives made in response to comments and extension of the financial planning model from 20 years to 30 years to incorporate the financial implications associated with removal of Wherry Housing over that time frame. The changes related to alternatives included assessment of the Final Plan Variant and modification of assumptions regarding program expenses. In the updated analysis, the program expense assumption for each alternative has been modified to increase gradually from $2 million up to the assumed goal for each alternative (e.g., $5 million for the Final Plan Alternative), rather than assuming an immediate increase in early years. These changes are explained in more detail in Volume III of the Final EIS, Appendix K.

The financial analysis was also expanded to include a number of new sensitivity analyses associated with the No Action Alternative (GMPA 2000), the Final Plan Alternative and Final Plan Variant, and the Cultural Destination Alternative. These alternatives were selected for the sensitivity analyses because they together represent the outer bounds of the full range of alternatives plus a mid-range alternative in terms of overall square footage, capital and operating expenses and other issues. The sensitivity analyses provide information that was required to respond to comments, assessing the financial performance of the alternatives when certain assumptions are changed, such as the level of operating expenses. The new sensitivity analyses complement the one associated with declining rents described in Draft EIS (Appendix J) and are presented in their totality in Appendix K of the Final EIS. The sensitivity analyses demonstrate the limitations of any long-term financial forecast, indicating widely divergent outcomes when analysis assumptions are modified. These limitations are clarified in the text of the analysis.

The land use assumptions tables in the financial analysis have also been clarified. One table now summarizes land use assumptions for each planning district in every alternative. These assumptions are also presented in the environmental consequences (land use) section of the EIS, and form the basis of all EIS impact analyses. Another table summarizes the amount of potential new construction assumed in each planning district in each alternative. The data for the Final Plan Alternative are consistent with quantitative limits set forth in the Plan document, and represents the maximum potential rather than proposed amount of new construction. Finally, the table summarizing the residential program for all alternatives has been revised to clarify assumptions regarding the number of units removed (whether through demolition or conversion) and the number replaced (whether within existing buildings or new construction). The housing goals in the Final Plan fall within the assumptions previously embedded in the Draft EIS analysis and carried forward in the Final EIS.

RESPONSE TO COMMENTS

1. Introduction

2. METHODOLOGY AND ORGANIZATION

2. METHODOLOGY AND ORGANIZATION

This section describes the way in which oral and written comments received regarding the Draft Plan and EIS during the public comment period have been summarized and responses provided. Subsequent sections provide an analysis of comments – their number, form, origins, and commentor characteristics (Section 3), comment summaries and detailed responses (Section 4), copies of all comment letters received from federal, state and local agencies (Section 5), and a list of all commentors and index to responses (Section 6).

2.1 RECEIPT OF COMMENTS

By the close of the public comment period, the Trust received a total of 264 written comment letters and faxes, 135 emails, and 2,657 form letters on the Draft PTIP and EIS. The Trust and GGNRA Citizens' Advisory Commission also heard 95 oral testimonies by 88 individuals, 61 of whom also submitted written comment letters. In addition, 25 comment letters were submitted after the expiration of the public comment period and have been considered and responded to as part of the record.

2.2 TOPICS

The volume of comments received, and the fact that many comments addressed the same or similar issues provided both the opportunity and the necessity for grouping and summarizing like comments or comments on a similar topic in order to allow for meaningful responses. Comments were grouped by topic and summarized. A total of 34 general topic headings were used; these are listed below.

- Purpose and Need (PN)
- EIS Process (EP)
- Public Involvement (PI)
- Vision (VI)
- Alternatives (AL)
- General Planning (GP)
- Planning District Concepts and Guidelines (PG)
- Type of Plan (TP)
- Historic Resources (HR)
- Archaeology (AR)
- Programmatic Agreement (PA)
- Open Space (OS)
- Biological and Water Resources (BR and WR)
- Land Use (LU)
- Visual Resources (VR)
- Air Quality and Noise (AQ)
- New Construction (NC)
- Housing and Employment (HO)
- Lodging (LO)
- Programs (PR)
- Visitor Experience (VE)
- Transportation and Circulation (TR)
- Transit Services (TN)
- Pedestrian and Bicycle Safety (PB)
- Parking (PK)
- Transportation Demand Management (TDM)
- Doyle Drive (DD)
- Water Supply and Utilities (UT)
- Schools (SC)
- Presidio Trust Operations / Financial Analysis (FI)
- Cumulative Impacts (CI)
- Tenant Selection (TS)
- Implementation Strategy (IM)
- Consultation and Coordination (CC)

2.3 SUBJECT AREAS

Within each topic area, comments were further aggregated into subject matter summaries. For example, within the topic area of Housing, subject matter summaries were developed to group comments related to new construction, removal of Wherry Housing, housing demand, and other housing-related subjects raised by the commentors. To assist reviewers, each comment topic is preceded by a short outline summarizing the subject matter within that topic.

2.4 SUMMARIES

Depending upon the level of public interest within a topic and its subject matter, comment summaries may encompass comments submitted by substantial numbers of commentors, or very few. Direct quotations from particular commentors are included in the comment summaries where they are helpful in communicating the essence of a group of comments. In the same instances, individual or representative commentors are often identified by name.[1] In most cases, commentors are not identified by name in the comment summaries, and those seeking responses to comments of a particular individual or organization should consult the index of responses (Section 6) to determine their location.

2.5 RESPONSES

Responses immediately follow each subject matter summary, and have been prepared by Trust staff and consultants following review of the comment summary and the full text of the original comments. All comments have been considered and responded to equally. Their importance is not weighted by the source of the comment or any commentor characteristic. Every comment or suggestion has value, whether expressed by one or a hundred commentors, and comments have been addressed for their substance, not for their frequency.

Responses provide explanations and clarifications related to the content of the Trust's Final Plan and the Final EIS. Where changes to either document have been made in response to comments, these are identified. Where questions are posed by the commentors, these are answered or acknowledged as outstanding issues. References to the Final Plan, EIS, technical analyses, and other source materials are included as appropriate. Cross referencing between responses is kept to a minimum, resulting in some repetition where the subject matter of comment summaries are similar.

2.6 ORIGINAL COMMENTS

While the comment summaries are intended to accurately reflect commentors' view and suggestions, they do not replace the comments in their original form. The original comments are available for review at the Presidio Trust Library, 34 Graham Street, in the Presidio, and constitute part of the formal public record. All comments have been made available to the Presidio Trust Board of Directors, and comments together with the entire record will be considered by the Board in making the final decision following publication of the Final Plan and Final EIS.

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[1] The Natural Resources Defense Council, National Parks Conservation Association, San Francisco League of Conservation Voters, and The Wilderness Society submitted a joint comment letter. This comment letter is referred to in these Responses to Comments as "NRDC" or "NRDC letter."

3. COMMENT ORIGINS AND COMMENTOR CHARACTERISTICS

3. COMMENT ORIGINS AND COMMENTOR CHARACTERISTICS

This section provides demographic information on the comment letters received, including geographic origin, general affiliation with various government agencies or public interest groups, user type (neighbor, dog walker, etc.) and format (letter, form letter, email, etc.). A summary of the form letters and petitions received during the public comment period is also provided. This information allows the Trust to better understand its public audience. It is important to note that regardless of the form or source of public comment, the Trust considered it and gave it equal attention.

3.1 GEOGRAPHIC ORIGIN OF COMMENTS

A total of 3,090 persons, organizations, and agencies provided comments in the form of oral comments at public hearings, letters, petitions, comment forms, and emails on the Draft PTIP and EIS.[1] Letters and emails on the Draft PTIP and EIS were received from all but one of the 50 states (North Dakota), the District of Columbia, and four foreign countries. A total of 1,311 letters and emails (42 percent) were received from California (Table 3-1). Of California letters and emails, 517 (39 percent) were from San Francisco. Responses from within the Presidio and nearby neighborhoods generated 196 letters and emails (15 percent of the California total) (Table 3-2).

Table 3-1. Origin of Oral and Written Comments

Country	State	Number of Responses
United States	Alaska	4
	Alabama	15
	Arkansas	4
	Arizona	39
	California	1,311
	Colorado	62
	Connecticut	25
	District Of Columbia	8
	Delaware	3
	Florida	134
	Georgia	41
	Hawaii	12
	Idaho	7
	Illinois	72
	Indiana	29
	Iowa	12
	Kansas	20
	Kentucky	19
	Louisiana	8
	Maine	13
	Maryland	38
	Massachusetts	52
	Michigan	51
	Minnesota	21
	Missouri	29
	Mississippi	6
	Montana	6
	Nebraska	2
	New Jersey	62
	New Hampshire	9
	New Mexico	18
	New York	148
	Nevada	16
	North Carolina	29
	Ohio	56
	Oklahoma	13
	Oregon	62
	Pennsylvania	80
	Puerto Rico	2
	Rhode Island	7
	South Carolina	7
	South Dakota	4
	Tennessee	30
	Texas	97
	Utah	12
	Virginia	52
	Vermont	5
	Washington	70
	Wisconsin	32
	West Virginia	9
	Wyoming	3
Australia		2
Canada		4
Netherlands		1
United Kingdom		3
Unknown Geographic Location		214
Total		**3,090**

[1] For the purposes of this estimate, commentors submitting two or more letters were only counted once.

Table 3-2. Regional Distribution of California Comments

Region	Location	Zip Codes/ County	Number of Responses
City and County of San Francisco	Presidio	94129	22
	Neighborhoods Bordering Park[1]	94115, 94118, 94121, 94123	174
	Rest of San Francisco County		321
Subtotal			**517**
Other Bay Area Counties	North Bay		86
	South Bay		83
	East Bay		149
Subtotal			**319**
Other California	North Coast		16
	Shasta Cascade		7
	Gold Country		31
	High Sierra		11
	Central Valley		22
	Central Coast		67
	Los Angeles County		169
	Orange County		46
	Inland Empire		13
	Deserts		19
	San Diego County		74
Subtotal			**475**
Total			**1,311**

[1]Includes Cow Hollow, Pacific Heights, Presidio Heights, and the Richmond District.

3.2 FORM LETTERS AND PETITIONS

A total of 2,657 out of 3,090 comment letters (85 percent) received during the public comment period for the Draft Plan and Draft EIS were form letters[2] reflecting the work of 11 organized response campaigns (Table 3-3). Two of these response campaigns each generated 1,473 and 882 letters, respectively, for a total of 2,355 letters, or 75 percent of all organized responses. In addition, three petitions[3] with 46, 11 and 3 signatures, respectively, were received (Table 3-4). Almost all (60) of the signatures on these petitions were from the San Francisco Bay Area.

[2] Form letters were defined as those letters that were received separately but containing identical or very closely paraphrased text. If a letter did not contain all of the information presented in a given form, or if it included additional comments, it was coded as an individual letter.

[3] Petitions were defined as single letters signed by multiple members of the public.

Table 3-3. Form Letters

	Subject of Form Letter	Number Received	Summary of Comments	Reference in Directory of Responses (Chapter 6)
1.	Presidio Should Serve Public Purpose	1,473	Requests that the Trust abandon the Draft Plan Alternative and adopt instead a plan under which the Presidio would serve public purposes, its historic and natural resources would be protected, and operating costs would be tightly controlled.	Form Letter 1
2.	Adopt the Original GMPA for the Presidio	882	Urges the Trust to abandon the Draft Plan Alternative and to adopt instead a plan based on the original GMPA.	Form Letter 2
3.	Implement the GMPA 2000 Alternative	18	Urges the Trust to implement the No Action Alternative (GMPA 2000) because it is financially viable, it is what the public wanted in 1994 and what the public wants now, and tenant organizations in a national park should be programmatic park partners.	Form Letter 3
4.	Demolish Historic Buildings	12	Recommends demolishing 360 historic buildings to increase the amount of greenery and open spaces.	Form Letter 4
5.	Commit to Completing the Crissy Field Wetland	37	Requests that the Trust revise the PTIP so that it makes a definite commitment to completing the Crissy Field wetland rather than just undertaking a feasibility study as was proposed in the Draft PTIP.	Form Letter 5
6.	Preserve Fort Scott Softball / Baseball Fields	205	Requests that the Trust not remove or convert the Fort Scott softball/baseball fields because there are few remaining lighted fields to provide much needed open space and recreation in San Francisco.	Form Letter 6
7.	Address the Needs for Off-Leash Dog Walking	3	Reminds the Trust that the Presidio functions as a city park to support diverse uses and recreational activities, including off-leash dog walking.	Form Letter 7
8.	Consider Impacts upon Bicyclists' Safety and Comfort	11	Urges the Trust to work toward a more bicycle-friendly Presidio, acknowledges some of the improvements for cyclists that have already been made, and recommends additional changes to improve the bicycling environment both as a transportation and a recreational route.	Form Letter 8
9.	No Further Development of the Presidio	2	Favors no further development of the Presidio and asks that development be kept to a minimum level and the park be used for a national center of environmental leadership because its value as a park is priceless.	Form Letter 9
10.	Embrace "Less is More" as the Aesthetic of the Presidio	8	Prefers less development, less programming, and limited directional flexibility and urges the Trust to adopt the No Action Alternative (GMPA 2000).	Form Letter 10
11.	Develop More Running / Biking Trails	6	Requests that additional running and biking trails be developed within the Presidio.	Form Letter 11

Table 3-4. Petitions

	Subject of Petition	Number of Signatures	Originator of Petition	Summary of Comments	Reference In Directory of Responses (Chapter 6)
1.	Commit to the Long-Term Welfare of Crissy Marsh	46	Presidio Native Plant Nursery and Restoration Volunteers	Encourages the Trust to work with the NPS to expand Crissy Marsh to create a more self-sufficient ecosystem and include in PTIP a number of principles that address preserving or enhancing marshlands.	Petition 1
2.	Preserve and Improve a Great Resource	3	Residents of San Francisco	Concerned that the Draft Plan would impose too much development, relies too heavily on the concept of a live/work community, and has a mission that is too ambitious.	Petition 2
3.	Provide for a Transit Hub and Operate a Shuttle Service Integrated into Adjoining Systems	11	Tamalpais Valley Gateway Coalition	Requests that the Presidio's transit hub and shuttle service be well integrated into a comprehensive system that would enable visitors to access park destinations north of the Golden Gate without use of the automobile.	Petition 3

3.3 ORGANIZATIONAL AFFILIATION OF COMMENTS

Letters and emails from federal, state and local agencies and interested organizations accounted for 21 percent (98 comments) of the total received (not including form letters). Businesses (21 letters), natural resource conservation organizations (12 letters), neighborhood associations (11 letters), and existing tenants (9 letters) represented the largest share of comments received from agencies and organizations (Table 3-5).

Table 3-5. Organizational Affiliation of Comments

Type of Affiliation	Name	Number per Affiliation Type
Federal Government Agencies	National Park Service, Golden Gate National Recreation Area National Park Service, Pacific Great Basin Support Office U.S. Environmental Protection Agency U.S. Fish and Wildlife Service	4
State Government Agencies	Department of Transportation Golden Gate Bridge District San Francisco Bay Conservation and Development Commission	3
City and County Government Agencies	City of Sausalito Planning Department of the City and County of San Francisco San Francisco County Transportation Authority	3
Federal Advisory Commissions and National Park Associations	Golden Gate National Parks Association Golden Gate National Recreation Area Citizens' Advisory Commission	2

Table 3-5. Organizational Affiliation of Comments

Type of Affiliation	Name	Number per Affiliation Type
Natural Resource Conservation Organizations	Alliance for a Clean Waterfront	12
	California Alpine Club	
	California Native Plant Society	
	Golden Gate Audubon Society	
	National Parks Conservation Association	
	Native Plant Nursery, Presidio Volunteers (petition)	
	Natural Resources Defense Council	
	San Francisco League of Conservation Voters	
	Sierra Club	
	Urban Ecology	
	Urban Watershed Project	
	The Wilderness Society	
Neighborhood Associations	Cow Hollow Association Inc.	11
	Cow Hollow Neighbors in Action	
	Lake Street Residents Association	
	Marina Civic Improvement & Property Owners Association, Inc.	
	Neighborhood Associations for Presidio Planning	
	Pacific Heights Residents Association	
	Planning Association for the Richmond	
	Presidio Tenants Council	
	Richmond District Democratic Club	
	Sequoias Residential Association	
	Telegraph Hill Dwellers	
Presidio Tenants	The Arion Press / The Grabhorn Institute	9
	Food, Land & People	
	The John Stewart Company	
	Lexnet Consulting Group	
	Presidio Golf Course	
	San Francisco Conservation Corps	
	Swords to Plowshares	
	Tides Foundation	
	YMCA	
Historic Preservation Groups	California Heritage Council	6
	California Preservation Foundation	
	Council on America's Military Past	
	Fort Point and Presidio Historical Association	
	National Trust for Historic Preservation	
	San Francisco Architectural Heritage	

Table 3-5. Organizational Affiliation of Comments

Type of Affiliation	Name	Number per Affiliation Type
University or Academic Groups	Malcolm X Academy	7
	San Francisco State University, Biology Department	
	San Francisco State University, History Department	
	University of California San Francisco	
	University of San Francisco	
	XCEL Academy	
San Francisco Planning and Business Organizations	Housing Rights Committee of San Francisco	5
	San Francisco Beautiful	
	San Francisco Chamber of Commerce	
	San Francisco Planning and Urban Research Association	
	San Francisco Tomorrow	
Arts Organizations	Arthouse	3
	California Lawyers for the Arts	
	Presidio Performing Arts	
Education and Recreation Organizations	Exploratorium	7
	Jamestown Community Center	
	San Francisco Dog Owners Group	
	San Francisco Little League	
	San Francisco Youth Commission, Culture and Urban Environment Committee	
	Wally Byam Caravan Club International	
Transportation Advisory Groups	Rails-to-Trails Conservancy	5
	Rides for Bay Area Commuters, Inc.	
	San Francisco Bicycle Coalition	
	San Francisco Medical Air Access Project	
	Tamalpais Valley Gateway Coalition (petition)	
Private Philanthropic Organizations	Evelyn & Walter Haas, Jr. Fund	1

Table 3-5. Organizational Affiliation of Comments

Type of Affiliation	Name	Number per Affiliation Type
Businesses (speaking for or as the owner of a business)	Arbor House, LTD Engineers and Filmmakers Computer Users Group Ernest A. Dernburg Medical Corporation Karin Flood Eklund, KTB Management Group GCA Strategies Intrinsic Graphics Law Office of Hubert D. Forsyth Law Offices Wilson & Casey Malcolm H. Gissen + Associates Marilyn D. Mintz MurphyReed Design Group Ohashi Design Studio Okamoto Saijo Architecture Sapp Devco (on behalf of Costco) Carl Scheidenhelm, AIA Dr. David L. Schneider Silicon Valley Community Ventures Student Leadership Success Solutions David J. Tirrell, AIA Jay Willner, WEH Corporation Kathleen M. Winslow, MFCC	21
Presidio Advocacy Groups	Friends of the Presidio National Park Preserve the Presidio Campaign Presidio Challenge	3
Individuals	(no specific or identified affiliation)	2,989
Total		3,090

3.4 SELF-IDENTITY OF COMMENTORS

Approximately 225 (76 percent) of all commentors submitting individual letters did not identify themselves as a particular type of user. Of commentors that explicitly characterized themselves in some particular manner (e.g., I am a native of San Francisco), the largest groups were long-term residents of San Francisco (5 percent) followed by neighbors (2 percent) (Table 3-6).

Table 3-6. Self Identity of Commentors (User Types)

User Type	Number of Responses
San Francisco Resident, Nonspecific	19
Neighbor	7
San Francisco Native	4
Native Plant Habitat Restoration Volunteer	4
Marina District Resident	3
Presidio Resident	3
Community Member, Presidio Restoration Advisory Board	2
Recreational Vehicle User	2
Runner	2
San Francisco Visitor	2
Taxpayer	2
AmeriCorps Worker	1
Bird Watcher	1
Board Member, Pacific Heights Residents Association	1
Certified Arborist	1
Citizens' Member, Doyle Drive Task Force	1
Cow Hollow District Resident	1
Daily User	1
Environmentalist	1
Former Chicagoan	1
Former Military Personnel Stationed at the Presidio	1
Golfer	1
Graduate Student	1
Marin County Resident	1
Member, Neighborhood Associations for Presidio Planning	1
Oregon Resident	1
Preschool Owner	1
Presidio Employee	1
Public School Teacher	1
Richmond District Resident	1
Sierra Club Member	1
Supporter of GGNRA	1
Urban Planner	1
YMCA Member	1
No Identified Type	225
Total	298

3.5 FORMAT OF COMMENTS

Most of the form letters (93 percent) were sent by email. Commentors choosing to submit their own comments generally sent their written comment letters by mail or fax (65 percent). Email was also used (35 percent). Only 34 commentors chose to provide their comments orally at one or more of the public hearings without also submitting their comments in writing (Table 3-7).

Table 3-7. Format of Comments

Response Format	Number of Responses	Number of Signatures
Form Letter Sent by Mail or Fax	174	174
Form Letter Sent by Email	2,483	2,483
Letter Sent by Mail or Fax	198	198
Letter Sent by Email	135	135
Petition	3	60
Unique Oral Comments	34	-
Unique Comment Cards	63	63

4. RESPONSES TO COMMENTS

4. RESPONSES TO COMMENTS

This section provides summaries of all the comments received, along with written responses. See Section 2 for a description of methodology and organization, and Section 6 for an index of commentors and responses.

4.1 PURPOSE AND NEED (PN)

CONTENTS

Clarifying the Definition and Scope of PTMP

PN-1. *Relationship of PTMP to Other Laws and Plans*
PN-2. *Relationship of PTMP to Plans for Other Parks*
PN-3. *Relationship of PTMP to NPS Management Policies*
PN-4. *Amendment to the GMPA or New Plan*
PN-5. *Programmatic or Implementation Plan*

Clarifying the Statement of Need for PTMP

PN-6. *Provide a Strong Statement of Need for the PTMP*
PN-7. *Provide Clarification of Specific Elements of the Statement of Need for PTMP*

Clarifying the Purposes/Objectives of PTMP

PN-8. *State the Goals/Objectives for PTMP*
PN-9. *Clarify Specific Objectives of PTMP*

CLARIFYING THE DEFINITION AND SCOPE OF PTMP

PN-1. *Relationship of PTMP to Other Laws and Plans*

Several commentors ask the Trust to clarify the relationship of the Plan to laws and other plans that govern or guide the Trust in Area B. One commentor asks the Trust to address the consistency of the Draft Plan with the Presidio Trust Act, the 1972 GGNRA Act, the NPS' Organic Act, the Presidio's status as a National Historic Landmark District, and the 1994 GMPA. Another commentor asks the Trust to provide a chart outlining the components of all binding laws and plans.

Response PN-1 – A general overview of the principal laws and guidelines governing the Presidio Trust and Area B activities is provided in a discussion of Background attached to the Final Plan (Appendix B). Specific provisions of law binding on the Trust and its activities include the Trust's enabling legislation – the Presidio Trust Act. The Trust Act directs the Trust to manage the property under its administrative jurisdiction in accordance with the purposes set forth in Section 1 of the Golden Gate National Recreation Area Act (GGNRA Act) and the general objectives of the General Management Plan Amendment (GMPA). In addition, the Trust is required to comply with the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). Numerous other laws also govern specific activities of the Trust within Area B. The most significant federal laws and Executive Orders bearing on the Final Plan and its future implementation are listed and briefly discussed in Section 5.2 (Compliance with Relevant Environmental Laws and Executive Orders) of the EIS. The Final Plan is consistent with these laws and guidelines.

The Presidio Trust, first and foremost, is bound by the law establishing the Trust – The Presidio Trust Act (Title I of Public Law 104-333, as amended, 16 U.S.C. Section 460bb appendix). The Trust Act was Congress' response to a number of competing public policy goals, including concern for the preservation and management of an extraordinary place, concerns about the high costs of the Presidio in relation to other units in the National Park System, the need to reduce the costs of the Presidio to the federal government, and the desire that the Presidio should be retained within the GGNRA rather than sold as federal surplus property. The legislation therefore devised a means to preserve and protect a nationally significant cultural and natural resource while reducing costs to the federal government.

The requirements imposed on the Trust by the Trust Act differ significantly from those that NPS must meet in managing property under its administrative jurisdiction. For example, first, the Trust must manage its portion of the Presidio in such a way as to become financially self-sufficient by 2013 – that is, to generate sufficient revenue to fund the operating and long-term capital and maintenance costs for the Presidio without continuing federal appropriations after 2012. If the Trust is not successful in meeting this goal

by the deadline, the 1,168 acres will revert to the General Services Administration for disposal (Trust Act Section 104(o)). Section 104(n) of the Trust Act further requires the Trust, in selecting tenants, to give primary emphasis to those that enhance the financial viability of the Presidio and facilitate the cost-effective preservation of historic buildings. In adopting this criterion, the House Committee on Resources noted that it was "concerned that strict adherence to potential tenants targeted in the Presidio general management plan would result in leases that are substantially below market value and which would seriously undermine the financial viability of the Trust."

The unique provisions of the Trust Act must be read together with the Trust Act's requirement to manage the properties under its administrative jurisdiction in accordance with the purposes of the Act establishing the GGNRA and in accordance with the "general objectives" of the GMPA. The purposes of the GGNRA Act are clear and are stated in its preamble as follows: "In order to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural, historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area is hereby established. In the management of the recreation area, the Secretary of the Interior shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this Act, the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area" (16 U.S.C. 460bb). These purposes are also reprinted in the Overview section and Chapter Four of the Final Plan. The Final Plan is, and its specific implementation projects will be, consistent with the general purposes of the GGNRA Act, which direct the utilization of the Presidio resources "in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management." It must be preserved "as far as possible, in its natural setting" and protected from "development and uses that would destroy the scenic beauty and natural character of the area." The Final Plan strikes this balance by calling for increased open space, decreased building space, the preservation and enhancement of important resources, such as the National Historic Landmark District and requiring compliance with quantitative, qualitative, and procedural constraints designed to ensure that physical changes are in keeping with the park's character.

By comparison, the general objectives of the GMPA, another important guidepost for Trust activities, are not precisely identified either within the text of the GMPA itself (i.e., no list of "general objectives" appears in the document) or by Congress in the Trust Act. In 1989, Congress designated the Presidio for closure as a military base. When the Army departed, jurisdiction over the Presidio was transferred to the NPS. The NPS prepared the GMPA, a building-specific general management plan for the 1,490-acre post. Since the Trust assumed administrative jurisdiction of 1,168 acres of the Presidio on July 1, 1998, it has used the GMPA as its foundational plan. The Trust set forth its interpretation of the general objectives of the GMPA in its Board Resolution No. 99-11 dated March 4, 1999 (General Objectives). These are reprinted in the Overview section and Chapter Four of the Final Plan. The Final Plan provides a policy framework to guide future decisions in furtherance of the General Objectives.

The Trust's planning process embraced significant policies and plan elements from the GMPA while also proposing that it be updated and otherwise changed in important respects. The Final Plan retains and updates many of the resource planning principles from the 1994 GMPA, and embraces many of its land use concepts. Changes reflect the Trust Act requirements, other changes in conditions since the GMPA was adopted, and the Trust's management approach. The GMPA will remain the governing plan for Area A, and will be administered by the NPS.

The Organic Act, enacted in 1916, created the NPS and contains policies related to NPS activities and jurisdiction. The Organic Act does not pertain to the Presidio Trust.

PN-2. ***Relationship of PTMP to Plans for Other Parks***

One commentor asks the Trust to explain why the Trust's Plan for Area B of the Presidio is unprecedented in the National Park System and whether any other park has a financial self-sufficiency mandate. One commentor "regrets" that the Presidio must become self-sufficient, suggesting the requirement is an "albatross," and asks the Trust to fight to overturn the decision.

Response PN-2 – In 1996, Congress recognized the Presidio as a site with unique circumstances requiring unique solutions and institutional arrangements. Understanding the reasons for creation of the Presidio Trust is important to the understanding the Trust's Plan for Area B of the Presidio and

to an understanding of why no other park in the National Park System has a financial self-sufficiency mandate.

The 1,490-acre park is distinctive in that it contains 768 buildings (of which 730 are in Area B and 432 of these are historic), including two hospitals, barracks, offices, warehouses, a golf course, a bowling alley, a former public health service hospital, and nearly 1,100 single-family housing units and many other residential accommodations, as well as a cemetery. Determining future uses of the Presidio has been a complex undertaking because of the highly varied mix of historic and non-historic buildings at the site and because of the substantial long-term finances needed to rehabilitate, preserve, and maintain the cultural and natural resources and infrastructure.

The Department of the Interior (DOI) developed early budget projections estimating the annual operating budget for the Presidio, exclusive of capital expenditures needed for infrastructure upgrades, at between $34 to $45 million per year – more than Yellowstone, Yosemite, Glacier, Great Smoky Mountains and Blue Ridge Parkway national parks combined. By comparison, the annual operating budget of $17 million for the entire 2.2 million acres of Yellowstone Park, the next most expensive national park, is less than half of the monies needed for the Presidio. Congress was unwilling to commit federal monies requested by the NPS; instead Congress showed a willingness to create an innovative public-private entity which would be charged with the long-term protection and maintenance of the Presidio.

Congress enacted Section 103 of the Omnibus Parks and Public Lands Management Act of 1996, Public Law 104-333, 110 Stat. 4097 (Trust Act), creating the Presidio Trust. The Trust is a federal government corporation established for the purpose of managing the leasing, maintenance, rehabilitation, and improvement of the non-coastal portions of the Presidio in accordance with the purposes of the GGNRA Act and the General Objectives of the GMPA. The NPS continues to manage the coastal areas. The Trust Act is law, and although its merits can be debated, it forms the legal basis for the Trust's jurisdiction, establishing the requirement for financial self-sufficiency by 2013. It would be inappropriate for the Trust or any other federal agency to advocate overturning the law, or to create a management plan that assumed the law would be changed.

Further description as to how and why the Presidio is different from other national parks and why most of the Presidio is under the administrative jurisdiction of the Trust rather than the NPS is in the background discussion attached to the Plan (Appendix B). The basic reorientation of the Presidio from a military post to the park was made by Congress in enacting the Trust Act. The Act is an inimitable compromise enacted by Congress to protect the natural and cultural values of a magnificent base and now national park. These circumstances and distinctive setting are sufficiently unique such that the Trust does not believe that the Trust Act or its implementation can be used as precedent for other units of the National Park System.

The Plan's unique aspects derive both from the history and physical attributes of the former military base and the Presidio Trust Act, which requires that the facilities within the former military base generate sufficient revenue to fund capital improvements and park operations. Approximately 650 building sites, structures and objects within the Presidio are listed on the National Register of Historic Places as being properties which contribute to a NHLD. No other unit within the National Park System approaches this number of useable historic structures. The combination of many useful and historic former military structures, in a natural setting in close proximity to a major urban center, has to a great degree introduced one-of-a-kind elements into the planning process for the Presidio.

PN-3. ***Relationship of PTMP to NPS Management Policies***

The NPS encourages the Trust to adopt NPS management policies to prevent impairment of national park resources. (The status of the Presidio as a national park creates a public expectation for a higher level of planning, preservation and provision of public access than that of other public lands. Specific directives are codified in the NPS's Management Policies, which are framed by the intent of protecting resources against impairment that could result from changes in land use or development.)

Response PN-3 – While the Trust shares the goal of preservation of park resources, NPS management policies and the no-impairment standard (which stems from the Organic Act) apply only to the NPS. Congress did not require the Trust's adherence to these policies and standard when it enacted the Presidio Trust Act giving the Trust general management direction. In developing the Plan, the Trust derived general policies and goals (planning principles) directly from the GMPA principles, and those principles in their inception derive from the NPS management policies. The Trust's planning

principles deviate from this NPS guidance only so far as necessary to clarify issues and reflect the differences between the Trust's statute, organization and mission. For a discussion of consistency of the PTMP with the Organic Act, refer to Response PN-1. For a discussion of consistency of the PTMP planning principles with the GMPA concepts and principles, refer to Response LU-1.

PN-4. ***Amendment to the GMPA or New Plan***

A few commentors ask the Trust to clarify the effect of the Plan, specifically, whether the Plan amends the GMPA or replaces the GMPA for Area B. One commentor asks why an amendment to the GMPA had not been made before adopting the Plan. The same commentor suggests that the GMPA should only be revised or changed by the NPS.

Response PN-4 – While the Trust continues to adhere to the general objectives of the GMPA, the Plan updates and replaces the GMPA as the governing document for Area B. The PTMP itself, of course, has grown out of the GMPA. The 1994 GMPA will continue to be administered by the NPS for Area A, and will remain the management plan for that zone.

Commentors inquire whether, in developing the Plan, the Trust rejected the GMPA in all respects. The answer is, simply, no. When Congress split the jurisdiction of the Presidio between Area A under NPS jurisdiction and Area B under Trust jurisdiction, the Trust attempted to use the 1994 GMPA as originally adopted by NPS to guide its actions. Congress had given the Trust some flexibility with respect to the GMPA by requiring that the Trust follow only its "general objectives." Nevertheless, controversy arose when the Trust was unable to follow the GMPA in all of its exacting detail, and the question was raised whether or not the Trust was following the GMPA. It should be noted that during the period when the NPS administered the entire Presidio, following every detail of the GMPA proved infeasible, and the NPS undertook projects at variance with that document. Examples include the decision to accommodate the Presidio Fire Department through an addition to the historic Fire Station (Building 218), and the O'Reilly Avenue Officer Family Housing, which converted multiple buildings designated for lodging in the GMPA to offices.

In 1999, the Trust agreed to undertake additional comprehensive planning for the area of the Presidio under Trust jurisdiction. Among the goals to be achieved by committing to revisit the 1994 GMPA was to identify and clarify the Trust's approach to implementing the GMPA and its general objectives.

In the course of the PTMP planning process, the Trust has proposed changing the GMPA in certain important respects. But, the PTMP is not a wholly new plan – the Trust developed the Plan by starting from the GMPA and borrowing most of its planning principles and many of its land use elements. Differences between the GMPA and PTMP reflect the range of new and different factors that must be considered by the Trust as a result of intervening historical developments, including passage of the Trust Act.

The GMPA was not amended prior to the PTMP, because prior to the creation of the Trust, NPS saw no need to change the plan it had just recently adopted. Once Congress enacted the Trust Act, the Trust worked to implement the GMPA in a manner consistent with Trust Act goals and requirements. As it became clear that there was a need to clarify the Trust's Presidio-wide approach to conditions that had changed since finalizing the GMPA and as the public asked the Trust to make clear its own priorities, the Trust agreed to undertake this PTMP planning process to revisit and update certain elements of the 1994 plan.

It is proper for the Trust, rather than the NPS, to have undertaken this planning process to change the GMPA for Area B, because Congress established the Trust as the agency with jurisdiction over that portion of the Presidio. As such, it is appropriate for the Trust to articulate within its own planning document the management policies that will guide its actions in furtherance of the general objectives of the GMPA.

Under Section 104(c) of the Trust Act, Congress designated the Trust as a successor in interest to NPS for purposes of NEPA. The effect of this provision is to afford the Trust the benefit of the environmental analysis undertaken by NPS in support of the GMPA. NEPA requires only that the Trust analyze environmental impacts that were not previously or adequately analyzed in the GMPA EIS, from which the PTMP EIS is tiered. This process allows efficient consideration of changed conditions and offers the public

opportunity for further review and comment on differences between the two plans and their projected impacts.

PN-5. ***Programmatic or Implementation Plan***

A few commentors ask the Trust to clarify whether the Plan is a programmatic plan or an implementation plan, noting an apparent inconsistency between describing the Plan as a "comprehensive land-use, transportation, and program plan" (page 2, Draft Plan) versus an "implementation plan subject to periodic updates" (page xi, Draft Plan). In raising this issue, commentors suggest that the lack of specificity and flexibility built into the Draft Plan was inconsistent with the moniker "implementation plan" because, as a conceptual land use document, the Draft Plan was "simply too vague to implement" and could not therefore be called an "implementation" plan.

Response PN-5 – The Plan is a programmatic, general plan, and the Trust acknowledges the public confusion that was created as a result of the name of the Draft Plan. The Trust's use of the term "implementation" in the title of the Draft Plan was meant to connote implementation of the Presidio Trust Act, the enabling legislation that created the Trust. The Trust never made clear this intent behind the use of the term "implementation" in the name of the Plan and the name was widely misunderstood by reviewers of the Plan. Therefore, in response to these comments, the Trust has changed the name of the Plan from the Presidio Trust Implementation Plan (PTIP) to the Presidio Trust Management Plan: Land Use Policies for Area B of the Presidio (PTMP). In addition, any language in the Plan overview and elsewhere describing it as an "implementation plan" has been deleted and changed to explain that PTMP is a general plan that sets a land use and policy framework from which future decisions will be made. Similarly, the PTMP EIS is a programmatic EIS from which future environmental analysis may be tiered.

The Trust believes the public's confusion was also created in part because, in the NPS planning context, an "implementation plan" implies a type of plan that follows from a general management plan and is therefore more detailed, site-specific, and capable of on-the-ground implementation without need of further decision-making. See National Park Service's Director's Order #2: Park Planning. Creation of an "implementation plan" as understood by the NPS was never the Trust's intent as part of the PTMP planning process. Rather, PTMP was intended to be and remains a general policy, land use and transportation framework that will guide the Trust's future decision-making about site-specific projects and opportunities when they arise.

In raising this issue, some commentors sought to understand the degree to which there would be more specific proposals with additional public involvement and review after finalizing the PTMP. This aspect of the comment is addressed under the responses to Public Involvement comments. Other commentors sought to understand whether the Trust should be preparing a supplemental EIS to the 1994 GMPA EIS as opposed to a new programmatic EIS independent of the GMPA. This aspect of the comment is addressed under the responses to EIS Process comments.

CLARIFYING THE STATEMENT OF NEED FOR PTMP

PN-6. ***Provide a Strong Statement of Need for the PTMP***

The NPS criticizes the Trust's statement of need for the Plan as failing to provide a strongly supported justification of need. Other commentors ask that the Trust provide clear reasons for "rejection of the GMPA," a plan that represented a consensus over many years of work, and address the apparent inconsistency of proposing to change a GMPA-based alternative when it would meet the Trust's requirements for financial self-sufficiency. They also suggest that any change to the GMPA is inconsistent with the statutory goals in Sections 101(5) and (7) of the Trust Act of protecting the Presidio's resources and minimizing cost to the federal government, and ask the Trust to address this apparent inconsistency in its statement of need.

Some commentors express general confusion as to whether the Trust is proposing to embrace the objectives of the GMPA or abandon them. The City and County of San Francisco (CCSF) Planning Department comments that the statement of need should not be so narrowly drawn as to focus primarily on achieving a financial strategy but should embrace more fully the key objectives of the GMPA such as protecting resources, providing quality programs, and allowing public enjoyment of park resources. The CCSF Planning Department also comments that the key objectives of the GMPA were nowhere stated in the text of the PTMP and that therefore the Trust had failed to meet the need (stated on page 8 of the Draft EIS) to bring the GMPA

concepts and principles into conformity with the Trust Act. The CCSF Planning Department further notes that the degree to which the complete vision and mission of the GMPA is accomplished by an alternative should be one of the criteria for evaluation and selection of alternatives. Another commentor asks the Trust to state the need for "abandoning the GMPA's objectives, including the objectives of minimizing new construction, attracting mission-related tenants, relying on tenants – in concert with NPS – to provide public interest programs, and committing to a modest level of overall activity and visitation." Another commentor asserts that an adequate statement of purpose and need must "specifically contrast and compare the programmatic purpose of PTIP and the GMPA" so as to adequately compare whether program alternatives "meet or fail to meet the program purpose." The commentor therefore suggests that the Trust prepare a matrix emphasizing contrasts or changes in policy between the PTMP and the GMPA.

Response PN-6 – NEPA requires a brief discussion of the need for a proposed action. In the context of a Plan, the statement of need identifies and describes why the existing circumstances are inadequate and need to be changed. The Trust offers three general reasons for proposing to update the 1994 GMPA for Area B of the Presidio and discusses each in detail in the first section of the EIS: (1) adoption of the Trust Act, (2) intervening conditions, and (3) new policies and management approaches of the Trust as successor to the NPS, which together provides a sufficient statement of the need, consistent with NEPA's requirements, for proposing to update the 1994 GMPA for Area B of the Presidio.

The need for change is not premised, as some comments suggest, upon a need to "reject the GMPA." It is based rather upon the three general reasons outlined above and discussed in the first section of the EIS. The Trust makes clear in the need statement that it proposes to retain "as much as practicable from the GMPA." In addition, the EIS analyzes an alternative – the No Action Alternative (GMPA 2000) – which would implement the GMPA with as few changes as possible and still meet the requirement for financial self-sufficiency. This alternative, while not preferred by the Trust, has not been "rejected," as no final decision will be reached until the environmental review process is concluded and the Trust adopts a Record of Decision (ROD). The ROD will contain an explanation as to the basis of the Trust's decision, summarizing how the alternative selected meets the stated purpose and need for the project.

These commentors speculate that the Trust will not adopt the No Action Alternative (GMPA 2000), and argue that it should be embraced because it assures financially self-sufficiency, and the Trust has not singled out financial results as the sole planning objective. On the contrary, the Trust has also articulated objectives relating to resource protection objectives, allowing public enjoyment of park resources, the provision of quality programs, and housing, transportation, and many other issues. These planning objectives are included within an expanded statement of plan objectives in Section 1.3 of the EIS. Objective 5, "Consistency with Existing Plans and Policies," states the Trust's intent to embrace many of the planning principles and land use elements of the GMPA, along the lines suggested by the CCSF Planning Department. As noted in responses above, the Trust Act specifically references the general objectives of the GMPA, and the Trust's Plan would provide a policy framework for implementation decisions aimed at achieving those objectives. Nothing in the Trust Act binds the Trust to every specific of the GMPA or precludes update and replacement.

The General Objectives of the GMPA appeared in the Draft Plan, and are included twice in the Final Plan: in the Overview and in Chapter Four. The Trust declines the CCSF Planning Department's suggestion to evaluate alternatives based on "the degree to which the complete vision and mission is accomplished by an alternative should also be one of the evaluation criteria." It is the "general objectives" of the GMPA which the Trust is obligated to pursue, and this legal requirement must be met by any and all alternatives, and therefore would not provide useful differential criteria. The mission of the Trust under the Trust Act is not to implement the GMPA's vision of solving the world's most critical problems; it is to protect and preserve the Presidio's resources for enjoyment by future generations of park visitors. The Trust believes the vision of the GMPA limits tenant selection to mission-based tenants, and that this limitation may conflict with the Trust Act's tenant selection and resource protection mandates. Therefore, the Trust does not want to limit the consideration of alternatives to only those that embrace the GMPA's vision of turning the Presidio into a center to solve the world's most critical environmental, social, and cultural problems. This "global center"

vision is one of the key elements proposed for change in this planning process, and in response to comments, this change is described explicitly in the Overview of the Final Plan.

In assessing the need for change, many commentors appear to assume that achieving self-sufficiency is the primary or sole basis for proposing a plan update. They assert that if the GMPA itself will meet the goal, there is no adequate statement of need for changing the GMPA. Moreover, they seem to suggest that if a GMPA-based alternative can be made financially self-sufficient, then there is no justifiable reason to consider a plan update or other reasonable alternatives. These reviewers may have read the statement of need too narrowly. Financial self-sufficiency is one important condition of the Trust Act that must be met, but is not the sole mission of the Trust or the sole basis upon which alternatives for change are being developed. Furthermore, there are an infinite number of ways to achieve financial self-sufficiency, and the Trust is entitled to consider whether one approach to self-sufficiency may be better suited than another when considered in the overall context of the Trust's mission, policies, and management considerations.

All alternatives analyzed in the EIS would change the 1994 GMPA for the reasons outlined in the statement of need, such as the need to comply with the new tenant selection criteria of the Trust Act and the need for the Final Plan to encompass the management style and approaches of the Presidio Trust rather than the NPS.

The fact that the 1994 GMPA had public support when it became final in 1994 does not obviate the need to consider changes to that plan in 2002. It is well understood by the Trust that Congress' creation of a wholly-owned federal public corporation to manage lands and meet financial objectives largely without government support within a national park context was controversial and met with resistance from elements of the public. Some who wholeheartedly supported the 1994 GMPA have never supported the Trust. Other reluctant supporters of the Trust are still averse to changing the GMPA. Nevertheless, Congress spoke in 1996 when it changed the approach for the Presidio and created the Trust to carry forward the change. It makes sense for the Trust to assess through the PTMP planning process whether the pre-existing plan for the Presidio meets the Trust's new needs and considerations.

The Trust disagrees that its proposal to change the 1994 GMPA is inconsistent with the congressional findings in Sections 101(5) and (7) of the Trust Act. In fact, the congressional findings in these two sections juxtapose key elements that the Trust's planning proposals seek to balance. On the one hand, the Trust seeks to manage the Presidio's significant resources "in a manner which is consistent with sound principles of land use planning and management, and which protects the Presidio from development and uses which would destroy the scenic beauty and historic and natural character of the area and cultural and recreational resources[.]" On the other hand, the Trust seeks to achieve these resource protection goals while "minimiz[ing] cost to the United States Treasury and mak[ing] efficient use of private sector resources." Each of these goals is encompassed within the "Objectives of the Plan Update" articulated in Section 1.3 of the Final EIS. The language from Trust Act Section 101(5) is nearly identical to that in Section 1 of the GGNRA Act, which is part of the Trust's first objective of achieving consistency with Trust Act resource mandates. The concept in Trust Act Section 101(7) is encompassed within the objective of achieving financial self-sufficiency. Nevertheless, in response to this comment, the Trust's statement of objectives has been modified to include the language from Trust Act Section 101(7) within the Trust's second objective of achieving consistency with Trust Act financial mandates.

There exists no requirement that an adequate statement of purpose and need include a side-by-side comparison between the GMPA and the Final Plan or any other alternative being considered. First, the whole statement of purpose and need is to be "brief" (40 CFR Section 1502.13) (Indeed, CEQ originally proposed a one-page limit.) Second, such a comparison is, in fact, the purpose of the EIS process, and the Trust has compared all alternatives, including the Final Plan, with the GMPA-based alternative. The key differences between the GMPA and the Final Plan have therefore been fully identified in the Final EIS. The Final Plan would constrain new construction, ensuring an overall reduction in square footage and compatibility with the NHLD, seek a diversity of tenants based on criteria including reference to the general objectives of the GMPA, encourage delivery of public programs by the NPS, tenants, and others, and result in a modest level of overall activity. To the extent that these represent changes to the GMPA, the EIS analyzes the environmental effects of

these changes and the PTMP provides discussion in Chapter Four related to these Plan elements.

PN-7. ***Provide Clarification of Specific Elements of the Statement of Need for PTMP***

The NPS also seeks clarification of a number of specific statements within the EIS statement of need for the PTMP. Specifically, the NPS comments that the premature departure from the Presidio of the Sixth U.S. Army provides no justification for the Trust to depart from the GMPA, and asks the Trust to provide data supporting financial loss from this change. The NPS also asks the Trust to document loss of income from the NPS-inherited tenants or remove this rationale from the statement of need. NPS also asks the Trust to address why sufficient flexibility in the selection of tenants cannot be achieved through amendment of the GMPA, as was done in the Letterman Complex EIS process, rather than by adopting the PTMP. Lastly, the NPS among others ask the Trust to address why a higher upper square footage limit is needed as compared to the GMPA.

Response PN-7 – The Trust mentioned the early departure of the Sixth U.S. Army as among changed conditions justifying the need to consider changes to the GMPA. The NPS assumes this change is irrelevant to the plan update unless it accounts for a financial loss. The extent of financial contribution that the Army would have made had it stayed at the Presidio is unknown. The GMPA assumed relatively low rents from Army occupants; so, the Army's departure might, in time, improve the likelihood of receiving more rent from other tenants who may now or in the future occupy what would have been Army space. The change is nonetheless an important one whatever the long-term rental income, the Army's presence provided an element of stability which its departure ended. It is rational, therefore to consider changing elements of the existing GMPA to reflect a change of this scope.

Furthermore, the Army's departure is relevant for more than just financial reasons. As noted in the need statement, the Army would have occupied 30 percent of the Presidio's building space, including about half of the available housing. This change is therefore fully relevant; from it arises the need to change the assumptions about what type of user will occupy the 30 percent of space that otherwise would have been occupied by the Sixth U.S. Army under the GMPA. Thus, the departure of the Army creates a need and an opportunity to revisit land use assumptions, tenant selection priorities, housing occupancy policies and other Plan elements affecting 30 percent of the Presidio's building space. The Trust is therefore retaining the discussion of the departure of the Sixth U.S. Army despite NPS' suggestion to remove it unless it accounted for a financial loss.

The NPS asks that unless the Trust can document the loss of income from NPS-inherited tenants, that the Trust delete any mention of early NPS leases that provided for minimal long-term revenues. Any leases, whether they are NPS-concluded leases or Trust leases, that have come into effect since the GMPA became final are a relevant financial factor to consider in assessing the need for change. The existence of low or zero-rent leases in particular is relevant to a consideration of whether these types of leases remain appropriate and the proportion of these type of leases that the Presidio can sustain while still achieving its other mandates and goals. In response to this comment, the Trust has retained the mention of low-rent leases as among the circumstances that need to be revisited as part of a proposed plan change, but has also broadened the text of the need statement to encompass all pre-existing leases as among circumstances that need planning consideration.

The NPS suggests that the need for flexibility offers little justification for considering changes to the GMPA, and suggests instead that the Trust merely amend the GMPA, as it did with the Letterman Digital Arts Center (LDAC) project, each time the Trust needs the flexibility to select a tenant that differs from what was prescribed in the GMPA. The suggested approach would be impractical given the time involved in serially amending the GMPA, and the need for the Trust to quickly lease buildings and generate revenue to support the park. Amending the GMPA for the LDAC project took over two years. During that time, the Trust confronted the GMPA presumption that only certain types of tenants would be permissible, there was a measure of public controversy centered upon the Trust not finding the type of mission-enhancing tenant called for in the GMPA. It is this aspect of the GMPA that was one of the factors which led the Trust to undertake the current planning process and to pursue an updated management plan with additional flexibility. The financial imperative of reaching self-sufficiency by 2013 and supporting the park indefinitely after that does not afford the time to go through the

cumbersome process of amending the GMPA each time a site-specific or building-specific assumption of the GMPA must be changed. Furthermore, it is inappropriate for the Trust to rely upon the GMPA tenant selection strictures when the Trust Act has imposed additional statutory tenant selection criteria.

The NPS suggests that if flexibility is needed in the upper square footage limit, the EIS' statement of need should address this issue. As a threshold matter, the purpose of a need statement is not intended to justify any single characteristic of any single alternative. The EIS presents a range of alternatives, none of which would increase building space in the park above existing levels, and some of which would reduce the amount of space, but to a lesser extent than proposed in the 1994 GMPA. A purpose and need statement in the Presidio context is to set forth the Trust's underlying purposes and the needs described above, to which it is responding. They include a need "to remain flexible in managing its resources for the long term," to "apply market principles and balance market opportunities and conditions with the programmatic and resource goals of the plan," to "more adequately address… market changes that could occur over time," to "consider other options such as alternate uses or a change in location," to consider "a different approach to leasing or financing that better addresses existing market opportunities or realities," to consider "revised land use concepts for the Presidio that can accommodate changing opportunities and market conditions," to "manage its portion of the Presidio in such a way as to become financially self-sufficient in both the short and long term." These reasons support reconsideration of the total building square footage needed in the Presidio over the long term.

CLARIFYING THE PURPOSES/OBJECTIVES OF PTMP

PN-8. ***State the Goals/Objectives for PTMP***

The NPS comments that both the Plan and the EIS should include a statement of the goals of the PTMP and that the Plan should explain the relationship between the goals and the objectives.

Response PN-8 – The main goals of the PTMP planning process are stated in Section 1.3 of the EIS and are referred to as "Objectives of the Plan Update" rather than as "goals." Ten Plan objectives are stated and each is briefly discussed. It is these objectives against which the final selection of a plan alternative will be assessed. Because the text of the EIS already states the objectives of the planning process, this text is not duplicated in the Final Plan. Instead, the Final Plan articulates an extensive policy framework with "planning principles," "planning guidelines," and other statements of intent that could be understood as "goals" of the Trust. Many of these goals derive from the principles and land uses in the GMPA, which itself did not include explicit "objectives."

PN-9. ***Clarify Specific Objectives of PTMP***

A number of commentors offer comments on specific PTMP objectives stated by the Trust.

- *Flexibility:* Commentors variously suggest that the PTMP objective of increasing flexibility is either unnecessary or inappropriate. Other commentors note that flexibility as an objective is appropriate, and that PTMP should be developed as a general plan and broad policy framework that maintains the flexibility to respond to future economic and market conditions.

- *Resource Protection:* The NPS and other commentors ask that the purposes of PTIP be restated so that the goal of resource protection is as strongly worded as that of achieving planning flexibility.

- *Visitor Enjoyment:* One commentor suggests that the entire purpose of any change to the Presidio plan be to enhance the visitor's enjoyment of the purity of its beauty and its military significance. Other comments support objectives that would make the park more vibrant and give both locals and visitors more reasons to visit the park.

- *Scale:* Commentors suggest that the scale of the Plan should be a primary objective, and that the Trust should identify and pursue open space as a primary goal and minimize built space, employees, and housing units. Other comments suggest that the Trust has set a goal of commercial development beyond its need and that the Plan's objective is to turn the Presidio into a business park.

Response PN-9 –

Flexibility: The Trust agrees with those commentors who recognize that increased flexibility is an appropriate objective for a comprehensive plan update and is therefore retaining this as an objective of the planning process articulated in Section 1.3 of the EIS. A plan that places undue restrictions on the Trust's land use and management decisions risks raising inconsistent, unnecessary, and unmanageable hurdles to the Trust's mission. Increased flexibility in leasing, building occupancy, and capital formation are some of the key areas in which the Trust has experienced problems in implementing the 1994 GMPA. As an example, some members of the public stridently disagreed with the Trust's selection of a digital art-related user for the 23-acre Letterman Complex site even though no research and education user as called for in the GMPA emerged from the marketplace. Critics argued that the GMPA limited tenants to those whose organizational mission was to solve the world's most critical environmental, social, and cultural problems. This interpretation of the GMPA has in part been the impetus to consider planning alternatives that build in a greater degree of management flexibility. To ensure that buildings can be rehabilitated and leased, and that revenues can be generated to support the park, the Trust needs a plan with the flexibility to, as the commentor notes, "respond to future economic and market conditions."

Resource Protection: The request to restate the goal of "resource protection" as strongly as "flexibility" suggests that the Trust presented the objectives for the plan update with a weighting of some form and also confuses objectives of the planning process with those of the plan itself. Each of the objectives described in Section 1.3 of the EIS are elements that the Trust intends the Final Plan, once selected, to meet. They derive in part from the Trust Act, the Trust's statutory mission, and in part from the Trust's policy perspective on how the Presidio should be managed. Objective 4, "Consistency with Planning Principles," expresses the Trust's desire to adopt a plan update that contains planning principles which express essential management objectives. These objectives encompass the goal of resource protection demonstrating the Trust's broad policy commitment to protect the varied resources of the Presidio.

Visitor Enjoyment: Although the Trust agrees that visitor enjoyment should be an important objective of the Plan, the Trust cannot, as was suggested by one commentor, make it the sole objective of the plan update. The objectives of the planning process listed in EIS Section 1.3 of the EIS encompass the goal of enhancing visitor enjoyment in many different aspects. As an example, by statute, the Trust must meet the purposes of the GGNRA Act, which include protecting the scenic beauty of the Presidio. In response to the commentors suggestion, an expanded discussion has been added to EIS Section 1.3 of the EIS under the heading "Programs" to emphasize that the Trust is seeking an update that will embrace a broad notion of the events, activities and land uses that bring people to the park. This objective of the Trust is expressed more fully in the planning principles within Chapter One of the Final Plan and reprinted in the Final EIS, Appendix B.

Scale: Contrary to assertions otherwise, the goal of the plan update is not to overdevelop the Presidio or to turn it into a "business park." The building resources within the Presidio are the primary and long-term means by which the Trust will create open space and preserve the treasured natural and cultural resources of the park. Different planning alternatives propose different balance between open space and built space. The Trust understands that some commentors would prefer a plan that maximizes open space and minimizes built space. To add this as an objective would be to assume the end result and to preclude a number of reasonable options from consideration.

4.2 EIS PROCESS (EP)

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COMPLIANCE WITH NEPA

EP-1. ***General Compliance with NEPA***

One commentor asks how the PTMP and EIS follow all NEPA regulations, mandates, and case law. (More specific comments addressed to the Trust's obligations under NEPA are addressed below.)

Response EP-1 – As is more particularly discussed in the responses to other more specific comments, the PTMP and the EIS were compiled in full

compliance with NEPA and its regulations and case law. Indeed, the Trust has made every effort to ensure that the NEPA process it has observed with respect to PTMP has been and is a model of NEPA compliance. NEPA directs that a federal agency examine the environmental impacts of official policy, formal plans, adoption of programs, and approval of specific projects it undertakes. If the agency determines that the action may have a significant impact, the agency must prepare an EIS. The EIS must discuss the environmental impacts of the proposed action as well as reasonable alternatives and their impacts. The agency must prepare and circulate a Draft EIS to other federal and state agencies and to the public for comment for a period of not less than 45 days. The agency must then respond to these comments in preparing a Final EIS. In so doing, the agency must either incorporate suggestions or explain its reasoning for its different approach. The Trust has followed these procedures. Again, for the reasons set out in the responses to the following specific comments, the Trust believes that it has acted in full compliance with NEPA, with the government-wide Council on Environmental Quality (CEQ) NEPA regulations, and with the Trust's own NEPA implementing regulations.

EP-2. ***Propriety of Tiering the PTMP EIS from the GMPA EIS***

Various commentors infer that the PTMP EIS should not tier from or supplement the GMPA EIS, but rather be a new and separate EIS. The NRDC believes that to properly tier under NEPA, the Trust must go from a broader EIS to a narrower EIS but does just the opposite, moving from a very specific GMPA EIS to a much broader EIS. The NRDC further maintains that the Trust cannot rely upon the earlier GMPA EIS as the basis for valid predictions because the GMPA has been unilaterally adjusted by the Trust. The CCSF Planning Department believes that it is improper to prepare a supplemental EIS on Area B alone when the 1994 GMPA addressed the entire Presidio and that the alternatives developed for the PTMP have little in common with and do not "flow down" from the 1994 GMPA EIS. A neighborhood organization asks "you have inferred that at a future date you will have further EIR [sic] for the programmatic elements of the Plan? Is this not Peacemealing [sic] a project? Peacemealing does not follow NEPA standards – how can you justify this methodology?" And: "In this implementation plan and EIS you are ambiguous. You infer that this is a supplemental EIS to the 1994 implementation plan and EIS and you infer that is a separate Implementation plan and EIS. You cannot have it both ways? Which one are you using?"

Response EP-2 – Tiering is a process which agencies are encouraged to use to eliminate repetitive discussions of the same issues and to focus on the actual issues ripe for discussion. In the CEQ's words, "Tiering is a procedure which allows an agency to avoid duplication of paperwork through the incorporation by reference of the general discussions and relevant specific discussions from an environmental impact statement of broader scope into one of lesser scope or vice versa" (CEQ, "Forty Most Asked Questions Concerning CEQ's NEPA Regulations," Q. 24c, 46 Fed.Reg. 18026 (Mar. 23, 1981) ("Forty Questions"). Tiering may also be appropriate at different stages of actions (40 CFR Section 1502.20).

It was the purpose of the NPS' EIS on its GMPA to evaluate the environmental impact of its proposed plan for the future of the Presidio. The Trust's PTMP EIS is similarly intended to evaluate the environmental impact of its own proposed Plan for Area B of the Presidio. Although there are differences, the Trust's Plan is derived in substantial part from the NPS' earlier plan. Indeed, Congress has mandated that the Trust in its planning adhere to the "general objectives" of the earlier NPS plan (Trust Act, Section 104 (a)). PTMP is not a wholly new plan for Area B. The PTMP reflects many of the GMPA's foundations and builds upon the GMPA while also taking into account the Trust's mandates, policies, and approaches and building in a measure of flexibility not contemplated in the GMPA. It is precisely this sort of circumstance in which tiering is especially useful. Rather than discarding the earlier analysis by the NPS, the Trust incorporates it and builds on it. That, in turn, alleviates the need to redo what the NPS has already done – in CEQ's words such tiering enables the Trust "to eliminate repetitive discussions of the same issues" (40 CFR Section 1502.20).

Some commentors suggest that it is somehow improper to tier other than from a broader EIS to a more specific one. That assertion confuses the usual with the necessary and applies judgments to the two EIS documents ("broader," "specific") that are entirely unwarranted. As CEQ stated in the guidance quoted above, tiering may be from an EIS of broader scope to one of lesser scope "or vice versa." As such, tiering often takes place, as here, at different

stages of an action (40 CFR Sections 1502.20, 1508.28 (b)). Here the planning process for the future of the Presidio, commenced by the NPS, has reached a later stage, now undertaken by the Trust. In the future, further, more specific plans and actions will occasion the preparation of still further NEPA documents tiered from the earlier ones. The evolution of Presidio planning lends itself particularly aptly to the tiering process.

As it was perfectly proper to tier from the earlier GMPA EIS, it was similarly appropriate to supplement it (40 CFR Section 1502.9 (c)). This Section provides that substantial changes or significant new circumstances or information relevant to environmental concerns provide the occasion for mandatory supplementation of an earlier EIS. Those criteria are satisfied here. The regulations further allow supplementation when the purposes of NEPA will be furthered by doing so, another criteria which the Trust believes has been met here.

By suggesting that the GMPA EIS was "more specific" than the Draft EIS, the commentor appears to be implying that because PTMP itself is a more flexible or general document than its predecessor, the associated EIS is somehow general or unspecific about potential impacts. This is not the case. The PTMP EIS looks quite specifically at a range of alternatives by assessing the impacts associated with the maximum level of activity possible under each alternative and an assumed palate of land uses in future year 2020. This is a conservative approach – because 100 percent occupancy of Presidio buildings may take longer under all alternatives – and results in a very specific list of impacts and mitigations. These impacts and mitigations are fully detailed in the text of the Final EIS (Volume 1). In comparing these to the GMPA EIS, it is difficult to see how one could be called more or less "specific" than the other.

With respect to the statement, which is accurate, that the GMPA covered both Areas A and B of the Presidio, while the Plan covers Area B, that reference is to the Congressional determination in the Trust Act to assign responsibility for Area B to the Presidio Trust while retaining Area A in the NPS' jurisdiction. As such, the 1994 GMPA remains the plan for Area A while PTMP, implementing the "general objectives" of GMPA, will be the Plan for Area B. The PTMP and the PTMP EIS make clear this division of responsibility. No NEPA requirement limits tiering to instances where the latter document is jurisdictionally coextensive with the former document as distinct from being jurisdictionally encompassed within the former document. This is similar to the City's exercise under the California Environmental Quality Act (CEQA) to prepare a supplemental or subsequent Environmental Impact Report (EIR) for the Mission Bay development plan, even though the former EIR examined an area with different geographic boundaries.

With respect to the assertion of one commentor that since future specific proposals at the Presidio will themselves be the subject of further NEPA analysis, this constitutes illegal piecemealing: that assertion is simply wrong. Future specific proposals will be subject to NEPA analysis, which will be tiered from the PTMP EIS. That is a completely appropriate process, encouraged by the CEQ NEPA regulations, which will ensure that future specific projects will be analyzed under NEPA when they have developed into "proposals" (NEPA Section 102 (2)(C)), that are ripe for decision.

EP-3. ***Objectivity of the Trust's Process and Outreach***

The NRDC, Sierra Club and several others believe that the Trust did not objectively prepare the EIS but rather "slanted" it in favor of the Trust's Draft Plan Alternative over other reasonable alternatives. Commentors suggest the Trust should not have inappropriately promoted the Draft Plan alternative at the expense of other alternatives by publishing a separate volume devoted to it, seeking public input through a mailer, offering outreach activities in connection with the planning effort, burying other alternatives on its website, and structuring the GMPA 2000 alternative to be at a financial disadvantage. The NRDC asserts that, rather than ensuring "a level playing field" for all alternatives, the Trust "engaged in an aggressive and highly problematic effort to promote its own preferred alternative at the expense of all others, including the GMPA 2000 alternative." The NRDC continues: "Indeed, throughout this campaign, the Trust has made it difficult for people to even learn about any option other than its preferred PTIP plan." The NRDC believes that the Trust made it difficult to learn about alternatives other than the Draft Plan Alternative. The Sierra Club notes that the Draft Plan was the subject of a "150-page book" and the other alternatives "get only 5 pages." The NRDC asserts that other agencies, such as the NPS and U.S. Forest Service, do not publish their own preferred plans at the inception of the planning. In addition,

they and another individual commentors allude to a "full color mailer" sent out by the Trust to promote "support for the Trust's desired outcomes," which, in their beliefs, was more "appropriate for a political campaign, but not this planning process." They, and another individual, infer that the Trust "engaged in improper outreach activities," such as making presentations about the proposed plan at community groups. The individual expresses concern that Trust staff, at these presentations and elsewhere, only presented "positive-sounding" facts about the Draft Plan. The NRDC also feels "troubled by the Trust's website" because "Visitors have to dig deeply in the site to find any mention of alternatives."

Response EP-3 – Certain of the comments misconceive the NEPA process. That process does not require that agency decision makers be without preferences among alternatives. Quite to the contrary, the CEQ NEPA regulations encourage the agency to be candid and specifically state what the agency's preferred alternative is at the Draft EIS stage (40 CFR Section 1502.14 (e)). CEQ has stated that "if an agency has a preferred alternative at the Draft EIS stage, that alternative must be labeled or identified as such in the Draft EIS" (CEQ, Forty Questions, Q. 4(b)). That identification is made so the agencies and the public can understand the lead agency's orientation (CEQ, Forty Questions, Q. 4(a)). The CEQ regulations go on explicitly to require the agency to identify its preferred alternative at the Final EIS stage (unless a specific law prohibits a given agency, such as an independent regulatory agency, from doing so.) (40 CFR Section 1502.14 (e)). NEPA, in short, does not require an agency to be without preferences among alternatives. What NEPA does require is that: (1) alternatives be presented in comparative form to provide bases for choice by decision makers and the public (40 CFR Section 1502.14); (2) that "substantial treatment" be devoted to each alternative considered in detail to enable reviewers to evaluate the comparative merits of each alternative (40 CFR Section 1502.14 (b)); and (3) that during the course of the NEPA process no actions go forward that have adverse environmental impacts or that would limit the choice of reasonable alternatives (unless they are themselves the subjects of separate NEPA processes) (40 CFR Section 1506.1).

The Trust followed these requirements precisely in the Draft EIS. The Trust labeled its proposed alternative the "Draft Plan Alternative" and identified it publicly as the Trust's proposed Plan. The Trust also set out in detail in the Draft EIS (pages 15 through 69) the comparison of alternatives required by NEPA Section 102 (2)(C)(iii) and Section 1502.14 of the CEQ NEPA regulations in a manner designed to ensure "substantial" treatment for each of the six alternatives. Each is described and compared in terms of the "concept" underlying the particular alternative, land and building uses, the built environment, open space and natural resources, cultural resources, the visitor experience, recreation, community/housing, transportation, infrastructure and utilities, and finance. This complete treatment in the required "comparative form" facilitates the reader's making comparisons among the alternatives. Each alternative is accompanied both by a colored map showing the different land uses (Figures 3, 5, 7, 9, 11, 13 in the Draft EIS) and by a black and white map illustrating building use preferences and setting out the square footage of built space proposed for each of seven different areas within Area B of the Presidio (Figures 4, 6, 8, 10, 12, 14 in the Draft EIS). As a further aid to the reviewers, the various alternatives are compared in tabular form in the Draft EIS (Table 1). To further facilitate comparisons among alternatives, specific sections of the Draft EIS discuss both those features that the different alternatives have in common (Draft EIS, Section 2.3) and those features that represent the key differences between the alternatives (Draft EIS, Section 2.4). Finally, the chapter of the Draft EIS that analyzes environmental impacts, the Environmental Consequences chapter (which is the most detailed chapter in the Draft EIS), analyzes each type of impact (e.g., natural resources, cultural resources, cumulative impacts), evaluating and comparing the impact of each of the six alternatives.

Presenting the alternatives in this way was both objective and accorded substantial treatment to each of the alternatives. The EIS was prepared so as to fully comply with NEPA's requirements. Finally, insofar as some comments were directed at other, non-NEPA documents, NEPA regulates what is presented in the EIS. It does not regulate other documents prepared by the lead agency in fulfillment of its other statutory responsibilities. The PTIP itself, referred to by one commentor, is the Draft Plan that is the subject of the Draft EIS. That Draft Plan, not multiple plans, constitutes the Trust's "proposal," which is then analyzed under NEPA in the Draft EIS.

Addressed below are responses to the more specific claims made by commentors concerning the objectivity of the Trust's process:

Publishing a Draft Plan Volume – It is completely proper for an agency to publish its preferred plan in non-final form while the NEPA process is under way. The Trust did so by publishing the Draft PTIP together with a Draft EIS analyzing not only the Draft Plan but also five other plan alternatives. NEPA itself requires an EIS on each "proposal" for a major federal action significantly affecting the quality of the human environment (NEPA Section 102 (2)(C)). The Draft PTIP was the Trust's "proposal," which is the subject of NEPA compliance in the PTIP Draft EIS. Indeed, CEQ commends the very practice employed here. In its Forty Questions, CEQ notes with respect to U.S. Forest Service EISs for forest management plans:

> The EIS identifies the agency's preferred alternative, which is developed in detail as the proposed management plan. The detailed proposed plan accompanies the EIS through the review process, and the documents are appropriately cross-referenced. The proposed plan is useful for EIS readers as an example, to show how one choice of management options translate into effects on natural resources (CEQ, Forty Questions, Q. 21).

The CEQ guidance additionally notes that this process saves time by permitting concurrent review of the proposed forest plan.

The assertion of two commentors that other agencies do not follow such practices is not accurate. In addition to the U.S. Forest Service example commended by CEQ, the Federal Aviation Administration routinely prepares and publishes its Airport Layout Plans (ALPs) for concurrent review with the NEPA documents that analyze them. Local to San Francisco, the U.S. Navy in partnership with the City prepared and circulated a draft reuse plan for Hunters Point Shipyard long before the Draft EIS regarding that plan was circulated for comment. The NPS also circulated its Draft GMPA, which devoted over 100 pages to "The Proposal," when it issued its Draft EIS in October 1993 (the discussion of alternatives in the Draft GMPA was limited to one page in Appendix B).

The assertion by one commentor that options to the preferred plan are not discussed is similarly without foundation. As discussed above and in Response EP-6, five other alternative plans are evaluated in the Draft EIS in a manner comparable to the preferred plan – the GMBA 2000 alternative (which is also the "No Action" Alternative required by NEPA), the Resource Consolidation alternative, the Sustainable Community Alternative, the Cultural Destination Alternative and the Minimum Management Alternative. Then the alternatives are compared in detail by type of impact in the Environmental Consequences chapter (Draft EIS, pages 219-398.) Refer to the discussion above and Response EP-6.

Seeking Public Input through a Mailer – NEPA and the CEQ regulations encourage agencies to enable public participation (40 CFR Section 1506.6). Specifically, agencies are directed to "[m]ake diligent efforts to involve the public in . . . implementing their NEPA procedures" (40 CFR Section 1506.6(a)), to provide public notice of hearings, meetings, and documents (40 CFR Section 1506.6(b)), to "hold or sponsor public hearings or public meetings" (40 CFR Section 1506.6(c)); and to "[s]olicit information from the public" (40 CFR Section 1506.6(d)). The Trust's own NEPA regulations echo the commitment to public involvement (see 36 CFR Section 1010.12).

The Trust has made every effort to involve the public, not only those whose immediate proximity assures interest or whose long involvement illustrates their commitment to participate, but also that far larger segment of the public whose interest in their park is yet to be kindled. The Presidio is, after all, a park for the whole American public. The Trust has committed, is committing, and will commit resources to informing the public about the splendor of the Presidio and about the specifics of the planning process and the NEPA process now under way to safeguard its future.

Certain of the comments criticize the Trust for publicity designed to make more members of the public aware of the Presidio's planning process and to involve them in it. The document the Trust prepared to comply with NEPA (the Draft EIS) does inform the public regarding NEPA compliance and the range of alternatives being assessed. The Trust distributed about 620 copies of the Draft Plan, about 440 copies of the Draft EIS, and about 300 CD copies of both documents. Also, both documents were posted in full on the Trust's website at ptip@presidiotrust.gov and announced in its monthly newsletter,

the Presidio Post. In addition, the Trust purchased advertising space in the local newspapers, inviting the public to participate in the planning process, and published legal notices announcing the availability of the Draft Plan and EIS. The scope of this distribution was not, however, the only means used by the Trust to invite public involvement in activities at the Presidio. The Trust regularly offers a continuing series of public meetings, its monthly newsletter, open houses, and numerous project-specific activities, all designed to ensure an open and public governance of the Presidio.

Distribution of the mailer referred to in comments was yet another means to widen the public audience to the Trust's planning process. It was part of a planned outreach effort near the release of the Draft Plan and EIS to raise awareness about the Presidio and to invite community members to participate in the planning process, including those who had never before been involved in Presidio planning. It was distributed to about 170,000 residents of San Francisco in areas beyond the neighborhoods immediately adjacent to the park. Contrary to commentors' assertions, it was designed to do nothing more than instill an interest in the planning process and get more people involved. The mail-back comment card with check-off items was a means for the Trust to identify additional persons who might have an active interest in the Presidio and who could be added to the Trust's mailing list, now at about 12,000. The comments received were not intended for or in fact used as substantive comments on the Draft Plan or any other alternative.

Not all commentors agree that the Trust's public outreach has been troublesome. The U.S. Environmental Protection Agency, which reviews EISs for adequacy under Clean Air Act Section 309 authority, notes that the Trust has provided a model for public participation. EPA's comment letter states, "The Trust has provided extensive opportunities for the public and interested parties to participate in the discussion and planning of land use and facilities management in the Presidio. Substantive information was provided to the public during the scoping process, and numerous public meetings have been held to get input on the Draft Plan."

Engaging in Improper Outreach Activities – As a generality, the Trust does not agree with the comment that the Trust is seeking too much public input, whether by affirmatively involving community groups or by invitations to involvement in the PTMP process widely communicated through the Trust's website and through mailers. The Trust is proud of its efforts to more comprehensively involve the public. The NRDC asserts that it is not aware of community outreach in which federal agencies affirmatively go out to the public rather than passively waiting to be asked to involve the public. Many agencies, of which the Federal Highway Administration is a conspicuous example, affirmatively reach out to involve the public by requesting opportunities to make presentations to civic and neighborhood groups. The Trust, too, believes active outreach is proper, appropriate, and an acceptable practice.

One of the benefits of the mailer was to identify persons and groups interested in small group interactions with the Trust about the planning process. The Trust received 1,300 response cards from the direct mailing, and 36 indicated an interest in hosting a small meeting of friends and neighbors or a neighborhood "coffee" where those who attended could meet with Trust staff and ask questions about the park planning process and the Presidio generally. Several commentors suggest that verbal summaries of the Draft Plan by Trust staff at informational meetings were incomplete and omitted information on potential negative environmental impacts. The Trust acknowledges that the primary purpose of outreach was to engender interest in finding out more about the Presidio planning process. In every instance, Trust staff made every attempt to be fair in the presentation of summary information, and the Trust can assure that in every instance, meeting attendees were informed of how they could get more complete information, a copy of the Draft Plan and Draft EIS, and become more involved in the public input process. It is true that most expressions of public interest at public gatherings concerned the Draft Plan rather than any of the other alternatives under consideration, so presentations, particularly those limited to only a few minutes, tended to focus on key highlights and characteristics of the Draft Plan Alternative. Nevertheless, when Trust representatives made presentations at organized or informal neighborhood group meetings, critics of the Trust's Plan were frequently also present to offer opposing information or points of view or to ask pointed questions that inherently balanced any potential for a one-sided presentation.

Objectivity of Website – In general, the Trust made its best efforts to provide the widest variety of options for obtaining complete and accurate information about the PTMP planning process. The Trust's website was yet one more option among many, and was designed with the goal of improving and expanding opportunities for public information access. The Trust made available complete versions of the Draft Plan, its short Overview/Executive Summary, and Draft EIS on its public website, and firmly believes it was equally easy to access and review the Draft EIS, including all of the alternatives, as to access the other documents.

Creating a Financial Disadvantage – With respect to commentors' concerns with bias in the financial comparison of alternatives, the No Action Alternative (GMPA 2000), favored by these commentors, included assumptions that tracked as closely as possible to the actions and timing of the 1994 GMPA and resulted in this alternative meeting the statutory condition of financial self-sufficiency by 2013. It has thus been considered fully and fairly along with the other five alternatives as part of the PTMP planning process. For detailed responses to commentors' financial concerns, please refer to Responses FI-15 through FI-23.

EP-4. ***Revisions to References to Scoping Comments***

One individual asks the Trust to revise descriptions on pages 407 and 408 of the Draft EIS that characterize the Draft Plan as responsive to scoping comments and to change the characterization from "several" to a "large number of environmental, neighborhood, and preservation groups and the majority of individuals" who asked the Trust to consider "a financially viable GMPA alternative." The same individual also takes issue with the Draft EIS' assertion that the Draft Plan Alternative is responsive to the majority of scoping comments.

Response EP-4 – In response to this comment, the description of the Scoping Alternative on page 407 of the Draft EIS has been revised to delete the numeric characterization of comments concerning a "financially viable GMPA alternative." The sentence in the Final EIS now reads "Comment letters asked the Trust to consider a 'financially viable GMPA alternative,' i.e., a new alternative patterned on the GMPA, but modified in only those ways necessary to make the alternative financially viable." Also in response to this comment, the first sentence of the first paragraph on page 408 of the Draft EIS referring to a "new scoping alternative" has been revised. The sentence in the Final EIS now reads "In response, the Trust chose to present a new alternative, which the Trust believed to be responsive to scoping input, as the Draft Plan Alternative in the Draft EIS."

Although the commentor disputes that the Draft Plan Alternative was responsive to scoping comments, it nevertheless was the product of discussions with a number of interested groups, including neighborhood and environmental groups, as well as individuals, during the scoping period. These discussions resulted in the Trust significantly modifying the proposal it originally intended to introduce as its Draft Plan Alternative. Thus, the Trust both modified the No Action Alternative (GMPA 2000) to meet the request of scoping commentors for a "financially viable GMPA alternative" and developed a new alternative as its Draft Plan, reconfigured in ways to address concerns articulated in scoping comment letters and meetings. For further response to this comment, refer to Response AL-4 and Final EIS, Section 5.1.2.

EP-5. ***Resolution 99-11 and NEPA Review***

One commentor requests that the Trust either amend Resolution 99-11, Statement of General Objectives of the GMPA (as part of the PTMP process) to more accurately and fully state the central objectives of the 1994 GMPA, or subject the resolution to a separate public review under NEPA. Another commentor asks how the 1994 Final GMPA, Resolution 99-11, and the No Action Alternative (GMPA 2000) are different and similar.

Response EP-5 – The current planning process would result in the Trust's adoption of policies, and it is being subjected to the NEPA process, of which this Final EIS is the manifestation. The Trust's task in implementing the congressional command to follow the "general objectives" of the GMPA was not to create and adopt a policy, but rather the more ministerial function of distilling and enumerating the principal objectives from an already adopted plan, which had itself been the subject of an EIS. As such, additional NEPA compliance was not required.

There is no reason to amend the General Objectives in Resolution 99-11. As is also discussed in Response VI-5, the term "general objectives" of the GMPA as enacted as part of the Trust Act was not precisely identified either by Congress or within the text of the GMPA. It therefore fell to the Trust to interpret the provisions of its authorizing statute. Construction of a statute, which is open to interpretation, by an executive agency charged with implementing its provisions is a basic maxim of administrative law. The Trust engaged in a process that ensured the identification of a comprehensive set of objectives that were not only true to the spirit of the GMPA, but also consistent with congressional guidance for the management of the Presidio and with the meaning of the term as used in the Trust Act.[1]

Despite the ministerial nature of the Trust's resolution to distill and enumerate the "general objectives" from an already adopted plan, the substance of that resolution is included in two places within the Draft PTIP, and thus was available for and generated public comment during review of the Draft Plan. See Response VI-5 for more discussion.

[1] The General Objectives as identified by the Trust are similar to an earlier statement of Presidio-wide goals prepared by NPS. In a 1994 NPS Request for Qualifications for the Letterman Complex, the NPS stated that programs and activities should support park-wide goals to the fullest extent possible. These "park-wide goals," said the NPS, "are summarized below, and are more fully described in the Draft General Management Plan Amendment: promote environmental stewardship and sustainability, encourage cross-cultural and international cooperation; provide community service and restoration; promote health and scientific discovery." Each of the NPS "park-wide goals" for the Presidio has been adopted, almost verbatim, as part of the General Objectives of the GMPA adopted by the Trust in Resolution 99-11, as have other objectives gleaned from the GMPA as a whole.

EVALUATION OF ALTERNATIVES

EP-6. *Evaluate a Reasonable Range of Alternatives*

Several commentors maintain that the Trust should have evaluated a fuller range of alternatives as required by NEPA, and should not have constructed alternatives that had so many common features.

Response EP-6 – The Trust fully recognizes and understands its obligations under NEPA to examine a reasonable range of alternatives. As CEQ pointed out, however, in its Supplementary Information accompanying publication of its regulations, there is no requirement "that an infinite or unreasonable number of alternatives be analyzed" (43 Fed. Reg 55983 (Nov. 29, 1978)). A certain amount of informed judgment goes into what range of alternatives to consider, bearing in mind the purpose and need as set out in the EIS and the actual historical and physical circumstances that shape the options for the future.

The Draft EIS itself summarizes the reasoning behind why certain factors were assumed to be common to all (or most) of the alternatives. The reasoning became one step in the Trust's process of delineating the range of alternatives analyzed. The Draft EIS explained:

> All alternatives share some common features or were assumed to result in common outcomes. The common features arise from a mix of circumstances. Some (e.g., LDAC, Doyle Drive improvements, the Mountain Lake enhancement project, the Vegetation Management Plan, the Trails and Bikeways Master Plan) reflected projects that have been the subject of independent planning and environmental review proceedings separately, sometimes under an alternate authority or jurisdiction. Others reflect prior or existing contractual commitments, requirements of the Trust Act, or requirements of other laws, which are consistent with all planning options (e.g., existing long- or short-term leases, building rehabilitations, environmental remediation activities, establishment of the William Penn Mott, Jr. Visitor Center, NPS law enforcement and interpretive roles). Some reflect policies and actions from the GMPA that the Trust has been implementing and

believes remain viable (e.g., provision of transportation demand management approaches, removal of Wherry housing units, targeting housing to Presidio-based employees). (These policies and actions would only be minimally addressed under the Minimum Management Alternative.) (Draft EIS, pages 16-17.)

The Trust continues to believe that these factors are valid ones to assist in delineating a reasonable range of alternatives. It must be borne in mind that the PTMP EIS is tiered from the earlier GMPA EIS and that Congress has directed the Trust to follow the "general objectives" of the GMPA. Those objectives and the earlier EIS have served to focus the alternatives considered in this EIS.

As the Trust considered common elements, issues where important differences could exist among the alternatives at this programmatic level became clear, and different approaches to these issues were developed for analysis in the EIS. The Draft EIS lists these important program-level differences:

- amount and type of open space;
- retention or loss of dwelling units;
- total building square footage and land-use emphasis, including variances in type, density, level of potential demolition, and possible replacement construction;
- level of resource enhancement;
- population and job totals;
- total capital improvements;
- timing of completion of capital improvements and time required to set aside financial reserves; and
- extent of park programming and approach to achieving park programs (Draft EIS, pages 18-19).

In accordance with the mandate of the CEQ NEPA regulations, the Trust has focused on the significant environmental issues set out above in the PTMP planning process (see 40 CFR Sections 1502.1, 1502.2 (b), 1500.4). In the case of the ongoing NEPA and planning process for the Presidio, this EIS represents one "tier" of an ongoing process (i.e., it is tiered from the earlier GMPA and Letterman EISs) and does not exhaust either planning at the Presidio or the NEPA obligations and opportunities associated with it. As the Draft EIS made clear, it is "a broad, program-level document that evaluates overall concepts for change, . . . " (Draft EIS, page S-2). The Draft EIS continued, "More detailed and site-specific plans would be developed in the future based on the direction established in the selected alternatives. Future activities would be subject to NEPA and National Historic Preservation Act (NHPA) reviews, involve coordination with the NPS and other agencies as necessary, and provide opportunities for additional public participation" (page S-2). The Trust may tier future projects from this PTMP EIS (page S-2).

Several commentors note transportation issues as illustrative of an allegedly undue commonality. One of those, Transportation Demand Management (TDM), was specifically addressed in the Draft EIS, which started by saying that TDM was called for in the GMPA (from which this planning process is tiered) and is currently under way and would continue. Four of the six alternatives would then go further with an enhanced TDM Program (Draft EIS, page 17) and one (Minimum Management) would not include a TDM program at all. Parking, on the other hand, has been addressed at a general level with overall parking running from a reduced 7,810 spaces under one alternative to a maximum of 11,210 under another (Table 1, Final EIS). The specifics of parking are in large part not addressed at this stage of planning, but will be addressed in subsequent planning.[2]

EP-7. ***Eliminate Minimum Management Alternative***

Several commentors claim that the Minimum Management Alternative is an unreasonable alternative and should be eliminated from further consideration

[2] Underground structured parking is not proposed nor analyzed as part of this PTMP EIS.

in the PTMP EIS. The NPS identifies various weaknesses in the Minimum Management Alternative, including its inability to meet the project objectives. The U.S. Fish and Wildlife Service (USFWS) notes that the alternative would "severely constrain or eliminate future large-scale habitat restoration and preclude recovery of listed species," and asks for further clarification as to why, for purposes of NEPA, it is evaluated in detail in the EIS. On the other hand, one commentor concludes that the financial summaries for the six alternatives show that the Minimum Management Alternative is "far and away the best plan" for complying with the Trust Act requirement to reduce expenditures and increase revenue to the federal government.

Response EP-7 – The Trust believes retention and evaluation of the Minimum Management Alternative provides valuable comparative information and is therefore important to the PTMP planning and decision-making process. NEPA does not require consideration of this alternative, but it nonetheless represents an important baseline for comparison. CEQ has explained, the "No Action" alternative in the context of lands subject to an ongoing management plan is the continuation, without change, of that management system (CEQ Forty Questions, Q.3). Therefore, in the context of this planning process, the GMPA 2000 Alternative represents the "no-action" alternative (i.e., the continuation of the ongoing management system, the 1994 GMPA) to the maximum extent feasible, given the changes imposed by Congress and other changes due to the passage of time.

Although it has, as some comments point out, some policy weaknesses compared to other alternatives, the Minimum Management Alternative represents a form of minimum intervention that the Trust believes is important to consider within the mix of alternatives. First, it is an alternative that evaluate the effects of a minimum amount of physical change, including no new construction and no demolition. Furthermore, it looks at the minimum amount of active intervention to control land use, and in this way minimizes costs over time. Lastly, it manages the existing built, natural, and cultural landscapes to the minimum extent needed to meet basic legal requirements.

Commentors seem to have misunderstood the Minimum Management Alternative. It is not the complete absence of management. It is the minimum level of management needed to meet the Trust Act and other legal requirements. It further represents an alternative with a minimum level of physical change from existing conditions, and in this respect represents a form of minimal "development." While the NPS' comments point to the potential weaknesses of the Minimum Management Alternative, the Trust is not proposing that it be adopted, only that its presence as an alternative provides a point of comparison which is useful. It is not improper to include an alternative even though it may not fully satisfy all project objectives. In this instance, understanding the environmental effects of a minimum amount of physical change is, in the Trust's view, important information that could be helpful to decision-makers in selecting a Final Plan. For example, the alternative informs decision-makers of the financial effects of assuming all leasing for "highest and best" use (i.e., to maximize revenues). Furthermore, its analysis illuminates the environmental effects of an alternative that proposes no new construction or building demolition. It also analyzes the financial and biological effects of retaining Wherry Housing. Inclusion of this alternative does not mean the Trust favors these options or this alternative. It does not. For further discussion of the Minimum Management Alternative, refer to Response AL-6. In response to these comments, the descriptions of the Minimum Management Alternative in the Final EIS (Summary Chapter and Chapter 2) have been refined to further clarify the issues discussed above.

EP-8. ***Include an Alternative with Less Square Footage than No-Action Alternative***

The NPS encourages the Trust to modify an alternative to have a lesser level of development than the No-Action Alternative. ("This would provide a more reasonable range of alternatives for public consideration.")

Response EP-8 – The Trust disagrees with NPS that a reasonable range of alternatives in this planning context must include an alternative with less square footage than the GMPA. The Trust is updating the NPS' 1994 Plan. Alternatives were considered in the NPS planning process that would have reduced square footage below the 5.0 million square feet provided by the GMPA. Now NPS suggests that the Trust should reconsider alternatives as though NPS had never considered an overall plan for the Presidio. The Trust does not agree that it must start Presidio planning from scratch and essentially redo the 1994 GMPA planning process; rather, the Trust is appropriately

tiering its consideration of alternatives from the existing GMPA and GMPA EIS.

That said, in an effort to be as responsive as possible to NPS and other commentors, the Trust has developed and analyzed a variant to the Final Plan, based upon suggestions made by the Sierra Club's comment letter, that evaluates a set of alternative actions under the Final Plan that result in less square footage than under the 1994 GMPA adopted by NPS. By assuming a slightly more aggressive program of building demolition than under the Final Plan and no new replacement construction, the Final Plan Variant results in a total of 4.7 million square feet of built space, about 300,000 square feet less than the 1994 GMPA. For further discussion of the Final Plan Variant, refer to Response AL-5.

EP-9. ***Process for Excluding Alternatives from Further Consideration***

The CCSF Planning Department asks whether the Trust "developed a list of feasibility factors based on cost, logistics, social, environmental or legal factors" to screen and eliminate alternatives from the 'reasonable range.'

Response EP-9 – The Trust's approach to developing a reasonable range of alternatives included consideration of three primary elements: (1) required elements of all alternatives (i.e., screening criteria); (2) common planning assumptions for all alternatives; and (3) key variables of the alternatives. The "screening criteria" are in effect the "feasibility factors" referred to by the City. For any alternative to be considered minimally viable, it had to meet the following minimum criteria: (a) be consistent with the Presidio Trust Act and meet the Act's financial mandate, i.e., be capable of achieving financial self-sufficiency no later than 2013 and be financially sustainable over the long term; (b) encompass Area B only, but be consistent with the GMPA for Area A; (c) meet the General Objectives of the GMPA as required by Congress and adopted by the Trust Board in Resolution 99-11; (d) preserve the Presidio as a park; and (e) meet the proposed planning principles.

The Trust considered but rejected certain alternatives because they failed to meet one or more of the screening criteria. For example, the Trust considered developing an alternative with more square footage than currently exists within Area B. This alternative was screened out as unreasonable because the proposed square footage falls outside the Trust Act's limits on the maximum amount of allowable square footage within Area B.

EP-10. ***Consistency and Specificity of the Description of Alternatives***

Several commentors state that the Final EIS should provide greater specificity and consistent detail in the description of alternatives to compare and contrast relative similarities or differences among alternatives. The NPS suggests that the Trust describe the desired future conditions for each planning area, historic structures that would be considered for demolition, specific uses for specific structures, and areas where new construction would likely be sited. Finally, to effectively compare and contrast alternatives, the Draft EIS summary should include a table that compares the critical components of each alternative (level of demolition, new construction, overall square footage)." The USFWS points out that the "level of detail and analysis for all reasonable alternatives evaluated should be similar to that of the proposed alternative and in proportion with the importance of their environmental consequences." They recommend that "potential individual projects be carried through summary tables, descriptions of alternatives, and discussion of environmental consequences consistently," and "using consistent language, style, and perspective when evaluating comparable environmental consequences in the EIS, to avoid the unintended appearance of bias."

Response EP-10 – Consistent with Section 1502.14 of the CEQ Regulations implementing NEPA, the Draft EIS provides a comprehensive description for all alternatives, devoting substantial treatment to each. This description includes a quantitative comparison of existing built space, maximum allowable construction and demolition, proposed land uses, acreage of open space, native plant community restoration, and forests. Quantitative information is supplemented with a narrative and graphic representation of each alternative. Refer to Response EP-3 and Final EIS Chapter 2. However, in response to these and other related public comments, additional specificity has been incorporated into the Final Plan and EIS. This supplemental information is provided on a planning district basis with additional detail for issues that were of concern to the public (e.g., housing). Providing a prescriptive, building-by-building definition of use, however, is contrary to the very essence of the PTMP. As discussed in Chapter 1 (Purpose & Need)

of the Final EIS and in numerous places within this Response to Comments volume of the Final EIS, the intent of the PTMP is to establish an updated land-use policy framework which is necessary to respond to the new requirements of the Trust Act and conditions which have changed since the 1994 GMPA was adopted. Essential to its success must be an element of flexibility which allows the Trust to be responsive to resource protection requirements as well as financial mandates. Refer to Type of Plan responses.

Contrary to the suggestion by the USFWS, the Trust believes that the EIS also provides a comparable level of analysis for all alternatives. Various computer models and other quantitative analyses were applied consistently for all alternatives to ensure that an equal level of study was achieved. In instances where alternatives would have similar environmental impacts, the EIS notes this similarity and references prior discussion as a means to reduce repetitive text. This approach is consistent with CEQ Regulation Section 1500.4(a), which encourages agencies to reduce the length of environmental impact statements. The Trust does not believe that this constitutes a "bias" towards any one of the alternatives. Refer to Response EP-3, which further addresses the issues raised by the USFWS.

EP-11. ***Tabular Comparison of Alternatives by Economic Efficiency***

The USFWS recommends that the Final EIS include a tabular comparison of alternatives that specifies the degree to which each alternative meets the criterion for economic self-sufficiency.

Response EP-11 – The Trust agrees, and the financial planning analysis conducted for the EIS includes baseline tables showing the relative economic efficiency of the different planning alternatives requested by the USFWS. As the Financial Analysis Technical Memorandum in the Final EIS, Appendix K explains in more detail, the EIS financial analysis was designed as a comparative model. It uses a conservative but optimistic set of planning assumptions. The relative strength or weakness of the alternatives in comparison to one another can be and has been evaluated and tabulated. The Financial Analysis Technical Memorandum describes this comparative analysis in detail. Further, Attachment E of Appendix K (Summary Financial Results: Baseline Scenario) includes summary financial tables showing the comparative financial results of the different planning alternatives. For each alternative, the baseline tables show: (a) a FY 2013 snapshot, indicating whether the planning alternative could, given the specific set of assumptions made across the alternatives, achieve financial self-sufficiency (whether revenues cover all assumed expenses) by the congressionally determined deadline year of 2013; and (b) a project summary table, indicating for each alternative the comparative capital costs, the projected year that capital projects could be completed, and the year financial reserves could be fully funded.

EP-12. ***Environmental Impacts of the Sustainable Community Alternative***

Two commentors ask why the Sustainable Community Alternative, which sounds appealing, in practice has the worst air quality, highest noise levels, and highest traffic levels.

Response EP-12 – When the Trust developed the Sustainable Community Alternative, it did so with a concept in mind, and a mix of uses consistent with the concept was developed. Specifically, the concept of sustainability dictated that a high percentage of people live close to their workplace to minimize traffic and auto trips. As a result, this alternative included a higher percentage of office, residential and retail uses than other alternatives. The Trust did not presuppose the environmental outcome of this use mix, and it did not become apparent until the evaluation of the alternative in the Draft EIS that this mix of uses resulted in relatively high levels of traffic, air quality impacts and noise.

EP-13. ***Revise the Resource Consolidation Alternative***

The USFWS recommends that the Resource Consolidation Alternative be revised to minimize cultural resource impacts based on the alternative's greater overall resource benefits when compared to the No Action Alternative (GMPA 2000).

Response EP-13 – As described in the EIS (Chapter 2, Alternatives), the underlying concept behind the Resource Consolidation Alternative is to enhance and expand open space and natural values. As inferred by its name, this alternative proposes to achieve this concept by providing a more or less contiguous area of natural/open space along the park's southern boundary, clustering development in the north. The alternative proposes removal of

buildings in various areas, including Wherry Housing, the Public Health Service Hospital, and East and West Washington housing areas. These concepts are also captured in varying degrees by other alternatives evaluated in the EIS. For example, all of the other alternatives, with the exception of the Minimum Management Alternative propose removal of Wherry Housing to provide for native plant community restoration (consistent with the Draft Recovery Plan for Coastal Plants of the San Francisco Peninsula, USFWS 2002). The Cultural Destination Alternative also proposes removal of the East and West Washington housing. The concept not captured by the other alternatives is the removal of the PHSH complex. To remove this concept from the alternative in order to minimize impacts to cultural resources would essentially dilute the comparison and weaken the diversity upon which the range of alternatives was built. The Trust believes that range of alternatives evaluated in the EIS provides a sound basis for weighing the multiple and sometimes competing resource needs at the park. Refer to Response EP-6 for additional information on this subject.

EP-14. ***Correct the No Action Alternative (GMPA 2000)***

The CCSF Planning Department and one individual state that the GMPA 2000 Alternative is not the No Action Alternative. The commentors suggest that the 1994 GMPA, the current adopted plan for the Presidio, offers a meaningful comparison with the other alternatives, and should be described and analyzed as the No Action Alternative. ("The full range of options for implementing the GMPA vision is not assessed under the alternatives. The conceptual alternatives formulated in November 2000 take integral components of the GMPA, separate them, and then set them up as separate organizing principles for each individual alternative. The Plan and EIS should have formulated, analyzed, and tested options for implementing the full range of the GMPA vision within the Presidio Trust constraints of financial self-sufficiency.") According to the one individual, the No Action Alternative should: (1) retain the vision and objectives of the 1994 plan; (2) not assume the Letterman Digital Arts Center project; (3) project costs in accordance with the 1994 assumptions regarding numbers of visitors and employees; (4) eliminate new construction; (5) demolish non-historic housing (rehabilitating historic housing); and (6) meet the financial mandate of the Presidio Trust Act.

Response EP-14 – The Trust disagrees that the GMPA 2000 Alternative is not an accurate presentation of the No Action Alternative as required by NEPA for the following reasons. As is also noted in Response EP-7, CEQ has explained that the "No Action" alternative in the context of lands subject to an ongoing management plan is the continuation, without change, of that management system (CEQ Forty Questions, Q.3). Therefore, in the context of this planning process, the GMPA 2000 represents the No Action Alternative (i.e., the continuation of the ongoing management system, which is the 1994 GMPA). The Plan as it was adopted in 1994 cannot be fully implemented exactly as it was written. Changes imposed by Congress under the Trust Act, physical changes in land uses and building treatments, amendment of the 1994 GMPA as a result of supplemental environmental reviews (e.g., the Crissy Field Environmental Assessment, the Presidio Fire Station Environmental Assessment, and the Letterman Complex EIS), and other changes during the eight years since the NPS' plan became final make implementing the 1994 GMPA precisely in the form it was adopted impossible.

The GMPA 2000 Alternative is the No Action Alternative because it adheres as closely as possible to the specifics of the 1994 plan approved by NPS. For example, its vision (i.e., as a global center to house organizations dedicated to addressing the world's most critical environmental, social, and cultural challenges), its tenant selection approach (i.e., seeking and selecting mission-based tenants), its approach to programming (i.e., programs provided by mission-based tenants), its plan for housing (i.e., removal and substantial reduction of the existing housing stock within the Presidio), and its other key land use and policy elements have been incorporated into and analyzed as part of the No Action Alternative (GMPA 2000). Indeed, in response to comments, the Trust has reviewed the land use designations of the No Action Alternative (GMPA 2000) and made corrections to a few of the land use assumptions to more accurately reflect the specific uses called for in the 1994 GMPA. For example, for the No Action Alternative (GMPA 2000), the overall amount of the Main Post's cultural/educational land use has been increased and office use decreased from what was presented in the Draft EIS to reflect the 1994 GMPA's designation of the Montgomery Street Barracks as the location for cultural/educational uses rather than office use.

Furthermore, despite the commentor's assertion otherwise, the Trust believes it has formulated and analyzed an adequate range of alternatives. The purpose of the PTMP planning process is to evaluate options for changing certain aspects of the 1994 GMPA that may not be well-suited to the Trust Act's varied mandates (e.g., tenant selection, financial, resource protection and preservation). To say that the Trust was required, as the comment suggests, to evaluate only alternatives that encompass the GMPA vision (i.e., the creation of a global center leased to predominantly mission-based tenants dedicated to addressing critical world problems) would not have served the purpose and need for the 1994 GMPA update. The Trust is required only to develop and consider reasonable alternatives and can screen out others that are unreasonable on the grounds that they fail to meet the proposed purpose and need.

In response to the commentor who suggests specific changes to the No Action Alternative (GMPA 2000), the Trust offers these explanations:

1) As explained above, the Trust's No Action Alternative does indeed retain the vision and objectives of the 1994 plan to the maximum extent feasible.

2) The Letterman Digital Arts Center is included in the No Action Alternative (GMPA 2000) because it represents an amendment to the 1994 plan approved pursuant to a previously completed Letterman Complex EIS and is now being implemented. See also Responses EP-16 to EP-21.

3) The commentor suggests that the Trust should presuppose the visitor and employee projections of the No Action Alternative and project costs based upon these visitor and employee numbers; that would be improper. The PTMP EIS impacts analysis for the No Action Alternative (GMPA 2000) updates the visitor and employee projections reported in the 1994 GMPA EIS for the preferred alternative. The PTMP EIS applies updated land use assumptions and improved assessment methodology to provide current and more reasonable predictions of future employee and visitor count. Refer to Responses HO-3 and VE-1. Furthermore and more importantly, visitor counts and employee projections are not a financial variable affecting the comparative efficiency of the No Action Alternative (GMPA 2000) with respect to financial self-sufficiency. The Trust performed a sensitivity analysis of the effects of varying operating costs on the efficiency of the No Action Alternative (GMPA 2000), but this variable had little if any effect on the efficiency with which financial self-sufficiency can be achieved under the alternative.

4) The Trust does not eliminate new construction in the No Action Alternative (GMPA 2000) because the 1994 GMPA called for new construction totaling 215,000 square feet, in addition to new construction proposed at the Letterman Hospital site. Thus, the No Action Alternative's (GMPA 2000) inclusion of 170,000 square feet was derived from the 1994 GMPA, acknowledging some new construction undertaken by the NPS prior to the Trust assuming jurisdiction. Eliminating all new construction would therefore be inconsistent with the 1994 GMPA.

5) The No Action Alternative provides for demolition of all non-historic housing called for in the 1994 GMPA and building treatments consistent with the other 1994 GMPA assumptions for achieving a reduced stock of housing units.

6) The financial analysis of the No Action Alternative indicates that it is capable of achieving financial self-sufficiency and financial sustainability over time.

EP-15. ***Identify the Environmentally Preferred Alternative***

The CCSF Planning Department asserts that the environmentally preferable alternative must be identified in the Final EIS, and recommends that such an alternative include: no more than 5.1 million sf of building space in both Areas A and B; no new construction; phased demolition called for in the GMPA; provide no more housing units than currently exist with the same proportion of single family units to SROs provided through reconfiguration and subdivision of existing buildings limit cultural and educational space to the 1994 GMPA amount; and limit retail tenants to those that would support park programs and services as envisioned in the 1994 GMPA. The USFWS asks the Trust to explain why components of the environmentally preferred alternative are not part of the Trust's preferred alternative.

Response EP-15 – Pursuant to Section 1505.2 (b) of the CEQ Regulations implementing NEPA, the Trust will identify the environmentally preferable alternative(s) in the Record of Decision. There is no requirement to identify it in the Draft or Final EIS. While the Trust appreciates the City's suggestions as to the components of the environmentally preferable alternative, NEPA requires that an agency identify which of the alternatives considered (i.e., the range of alternatives evaluated in the EIS) constitutes the environmentally preferable alternative(s) rather than constructing a new alternative. With respect to the USFWS inquiry as to why components of the environmentally preferable alternative are not part of the Trust's preferred alternative, as previously stated the environmentally preferable alternative has yet to be identified for this project.

ANALYSIS OF LETTERMAN DIGITAL ARTS CENTER

EP-16. *Treatment of the LDAC Project*

A number of commentors refer to the treatment of the Letterman Digital Arts Center (LDAC) project within the EIS. The CCSF Planning Department suggests that segregating environmental documentation of the LDAC "has the appearance of piecemeal development within Area B." ("It is difficult to analyze the effects of development of Area B without consideration of the Letterman Center, which lies within Area B,… since development in all parts of the Presidio is inescapably connected.") One individual poses the following: "The Letterman Traffic studies were not integrated into this EIS? How are you going to mitigate the noted increases in noise, air and transportation with the Letterman figures? How do you justify the cumulative of Letterman, the 1994 GMPA and the current EIS? What are your mitigations? How will they work?" The Pacific Heights Residents Association suggests: "Total impact studies…" of the Draft Plan alternative plus LDAC should have been prepared so that the "total impact of all the development could have been assessed." Another individual recommends that the Trust not allow construction to begin on the LDAC site until the PTMP planning and environmental review process is completed. ("The purpose of the plan is to guide development decisions; it would violate due process to proceed with a specific development before approving the guiding document. The final site plan is not yet approved, and we are hopeful that the Trust may reduce the size of the project.")

Response EP-16 – The LDAC represents a decision which has been made. This PTMP EIS accepts that and moves on to examination of alternative futures for the balance of the Presidio's Area B.

When Congress enacted the Presidio Trust Act, it created the Presidio Trust and mandated that the Trust achieve financial self-sustainability by 2013 and thereafter or the park would be closed and the property sold off for development (Trust Act Section 104 (o)). The Trust was confronted with a deadline and presented with a cluster of buildings within the Letterman Complex whose future was unclear. The NPS had hoped that these buildings would be leased by the University of California (UC) as a medical center, but UC decided to go elsewhere. Both the NPS and the Trust then sought a comparable medical research tenant, but none responded to the public invitation.

With that background, and considering that the hospital and research buildings were both large and of an architectural style at odds with all the other buildings in the Presidio as well as the fact that those buildings were not earthquake safe and would have needed massive expenditures to make them safe, the Trust requested proposals from lessors who could approximate the research and office functions envisioned for the UC facility, which would contribute significantly to the congressional self-sufficiency goal, and which would blend harmoniously with the other parts of the Presidio's built environment. The Trust went through a full NEPA process including preparation of a Final EIS that compared alternative proposals for the future of a 23-acre site within the Letterman Complex. The public was heavily involved, commenting at length in both written submittals and public hearings that the Trust conducted. That NEPA process ultimately concluded with a Record of Decision (ROD), which selected the LDAC as the developer/tenant for the 23-acre site. The Trust negotiated and entered into a development agreement with the proponent of the LDAC (Letterman Digital Arts, Ltd.); the existing hospital and research buildings have since been demolished (rendering moot any alternative futures for them); construction preparations are well under way, and the decision to proceed with the LDAC project is

considered final. The current PTMP EIS is tiered in part from the earlier Trust EIS on the future of the 23-acre site within the Letterman Complex. The decision as to the future of the LDAC was, in short, made in another, earlier NEPA process, and is now part of the background of the current PTMP process.

Indeed, it was the public comments on the Letterman Complex that contributed significantly to the decision to undertake the PTMP and its accompanying EIS. While acknowledging the statutory impetus for the LDAC decision and the importance of prompt and visible progress toward financial self-sufficiency, a number of commentors at that time suggested that the Trust should take a broader look at the overall concepts for the Presidio, including the extent to which the GMPA retained its validity and the extent to which updated plans were needed. The Trust was persuaded and agreed with those comments. In response, the Trust began the PTMP process, of which this EIS is the NEPA component. This document is tiered from both the NPS' GMPA EIS and the Trust's own Letterman Complex EIS. The LDAC represents an earlier decision already being implemented. There is no reason to revisit that decision, and the project and all of its components are assumed in the PTMP EIS analysis. Refer also to Response EP-20.

Commentors who express anxieties regarding the combined impacts from the LDAC project and the current planning effort may be assured that these are described in the PTMP EIS. All EIS alternatives assume LDAC, along with its employment, traffic, and other effects. Thus, the Presidio-wide information on employment, transportation, and other EIS topics presented includes the LDAC project's contributions. Specific examples include the following:

- the projected numbers of residents, employees, and visitors (provided in the Final EIS Section 2.0 and Section 4.0) include the projected 2,500 LDAC employees;
- the traffic analysis presents total traffic volumes, including traffic from LDAC, the rest of the Presidio, and all locations that experience growth before the analysis year of 2020; and
- the projections of energy use, water demand, and other service needs includes LDAC in addition to the rest of the Presidio.

Please refer to individual sections of the EIS and cumulative analysis for more information.

EP-17. ***Continuing Validity of the Letterman Complex EIS***

The Sierra Club questions the validity of the previous Letterman Complex EIS due to "significant differences that exist today from those assumed during the entire Letterman EIS process." ("In particular, there are extremely different financial circumstances, an entirely different set of assumptions for other areas of the park, including total building space, allocation among uses and planning districts, employment and visitation.")

Response EP-17 – The generic relationship between the Letterman Complex EIS and this EIS has been discussed in Response EP-16 above. With respect to the issue raised in these comments concerning subsequent developments, the premises underlying the comments are not accurate. While with passage of time there are always conditions that shift and assumptions that evolve, there are no significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts that provide the regulatory criteria for a supplemental document as set out in Section 1502.9 (c) of the CEQ NEPA regulations. While the Trust continues to develop and to make public ever more extensive information, including that pertaining to finances, the basic underlying consideration with respect to the Letterman Complex and the future of the Presidio remains unchanged – that the leasing arrangements to replace the two massive Letterman buildings are a substantial contributor to the Trust's statutory mission to achieve financial self-sufficiency by 2013. Also refer to Response FI-28.

EP-18. ***Include a "No-Build" Alternative for the 23-Acre Letterman Site***

The Sierra Club requests that the Final EIS should consider an alternative that analyzes the impact of not building at the Letterman Complex and recommends returning the site to open space. They believe that the benefits would be "obvious," the costs "not clear," and "as long as construction has not started," and a "definitive lease and site plan has not been agreed upon," its "size, shape and function, its very existence, should not be left out of consideration in the park-wide management plan." The Marina Civic Improvement and Property Owners Association suggests that if a lease for the

LDAC is signed prior to the ROD on the PTMP, it would "irretrievably commit federal resources (the Letterman site) to private hands, thereby prejudicing the selection of alternatives by negating the possibility of the selection of the "No New Construction" or the 1994 GMPA alternatives.

Response EP-18 – As outlined in Response EP-16, the Letterman Complex EIS process has concluded and the LDAC project is appropriately assumed in all PTMP alternatives, including the "no action" alternative (GMPA 2000). In the Letterman Complex EIS, as required by law, the Trust did present, compare, and evaluate a no build alternative. There is no necessity for revisiting that decision now. The comments, presumably in recognition that there is no legal obligation to reopen the Letterman process and reexamine a Letterman "no-build" alternative, suggests that such a course of action should be undertaken as a matter of public policy. The Trust understands and appreciates this suggestion, but has determined not to revisit these previously resolved issues but rather to move on to planning for the future of the Presidio and the many decisions which are either now ripe for discussion or which will become so in the future. See Response FI-28 regarding financial benefits of the LDAC project.

EP-19. ***Inclusion of the LDAC Project in the No Action Alternative (GMPA 2000)***

The Sierra Club believes that the No Action Alternative (GMPA 2000) "improperly" includes full demolition and build out of the LDAC and that the "properly constructed" base case should be as identified in the 1994 GMPA ("only 475,000 sf included for LAIR office space in the Letterman Complex, and 500,000 demolished for the hospital")

Response EP-19 – The larger question of what was resolved in the Letterman Complex EIS is discussed in Response EP-16, and the overall definition of the No Action Alternative in Response EP-14. With specific reference to this comment, the author notes the 1994 GMPA proposed reuse of one of the Letterman buildings and demolition of the other. As discussed in the Letterman Complex EIS, however, the GMPA EIS recognized the option of and the Letterman Complex EIS envisaged new construction such that the square footage of the Letterman Complex prior to the various NEPA evaluations would be maintained after these evaluations. As discussed in the Letterman Complex EIS, a viable alternative future for the Letterman Complex necessitated retention of both buildings and no proponent proposed their retention. Such an alternative then became unsupported, unrealistic, and speculative. Whether a non-historic building is retained or demolished and replaced with structures of comparable size does not affect the overall impact (except insofar as high-rise, massive buildings that clashed with their Presidio surroundings are to be replaced with low-rise buildings designed to fit more harmoniously into the park). There is no reason for revisiting in the PTMP NEPA process that which was earlier resolved in the Letterman NEPA process. Finally, as noted above, the Trust observes that following the Letterman Complex EIS and ROD, both Letterman buildings have been demolished.

EP-20. ***Consideration of LDAC Effects***

The Sierra Club contends that the Letterman Complex EIS did not analyze the "cumulative impacts of the entire park; nor does the Draft PTIP EIS in that it excludes the Letterman site project." The NRDC also maintains that the Draft EIS did not include and analyze the direct and cumulative effects of the LDAC. (The letter states that the Trust improperly obscured the environmental effects of the project on the overall park plan by assuming the project is already built.) An individual tells the Trust "You did not include the Letterman square feet in the Trust Draft Plan but do include it in the others. If you are going to take it out, do it for all alternatives." Another individual asks whether the Trust plans to build "2.199 million square feet of new replacement construction in Area B (Lucas 1.489 million square feet with underground parking garage and Trust Plan 710,000)."

Response EP-20 – Commentors misunderstand and misinterpret the Draft EIS with respect to the LDAC project and its environmental effects. The project itself has been included within every alternative. Both the direct and cumulative effects of the LDAC project are included in the Draft EIS. As addressed in Response EP-16, above, Section 2.3 of the EIS makes clear that the LDAC project is included as a common feature of every alternative because it has already been the subject of independent planning and environmental review, in this case the Letterman Complex EIS, and a final decision has been made and approved in the Record of Decision of May 2000.

The Letterman Complex EIS amended the GMPA EIS to include the LDAC project, and the PTMP EIS tiers from the GMPA EIS. It is therefore both proper and necessary to include the LDAC project as a common element of all alternatives.

For all impact topics where LDAC contributes to the future baseline condition, its environmental components are included in the impact topic base assumptions, and all additions to the baseline associated with LDAC are assumed as of full build-out of the project to ensure that its effects are fully captured in the PTMP EIS analyses. For example, the traffic trips associated with full build-out of LDAC are included in the traffic growth assessed in the traffic impacts analysis. Similarly, the water, electric, gas and other utilities demands and usage are also included in those impact topics. For every impact topic where LDAC would have a quantitative operational effect or qualitative effect at build-out, its characteristics have been included in the baseline assumptions, and in so doing, the full effects of the LDAC project are included in the EIS' analyses of direct effects. Similarly, the LDAC project is included in the PTMP EIS' analysis of cumulative effects. For additional information related to this subject, refer to Responses TR-2 and CI-1.

Several comments seem to suggest that the Trust should have treated the Letterman Complex project as though no earlier EIS had been prepared, no decision has been made, and implementation has not already begun. Despite these comments, having assessed environmental conditions for each alternative assuming LDAC build-out was both the proper and reasonable approach. If the EIS had assumed LDAC to be nothing more than a proposal, the PTMP EIS would have reanalyzed environmental impacts already fully analyzed as part of the preceding, separate, and final Letterman Complex EIS. It is simply unnecessary to reanalyze a project that has already been fully considered, and nothing in NEPA requires that the Trust do so.

Some commentors seemed confused by the Draft EIS' treatment of square footage associated with the LDAC project. The commentor who suggests that some alternatives include LDAC square footage while others do not is mistaken. Consistent with the approach of including LDAC as of its build-out, the total square footage associated with LDAC is included in the totals for the Letterman district and in the overall total square footage for each alternative. Furthermore, it would have been inconsistent and misleading to include this same square footage in the demolition and new construction totals because it would overstate the physical change allowed under each alternative. It was not necessary to include or to analyze the effects of the 900,000 square feet of building demolition on the Letterman 23-acre site, because the effects of this action have already been analyzed under the earlier Letterman Complex EIS and are assumed as part of the baseline of the affected environment. Nor is it necessary to re-analyze the effects of 900,000 square feet of new replacement construction associated with LDAC, because the effects of this action also has been previously analyzed. The Trust is not required to look back, assume decisions already made never occurred, and re-analyze them.

The Final Plan allows for up to 710,000 square feet of new replacement construction in Area B. New construction could take the form of a building addition, an annex adjacent to an existing building, infill buildings set within an existing building cluster, or stand-alone structures in developed areas to replace square footage removed in that location or elsewhere. See responses to comments on new construction for further discussion.

EP-21. ***Detail on the LDAC Project***

An individual requests detail on the LDAC project, including agreements, lease terms, and square footage. He inquires whether a list of all agreements between the Trust and the proponent of the LDAC project, with dates and length, be disclosed and copies included in the Final EIS.

Response EP-21 – The LDAC Development Agreement between the Trust and Letterman Digital Arts, Ltd. has been available for inspection and copying in the Trust's library since November 5, 2001. Copies can also be requested and purchased from Kinko's (located at 3225 Fillmore Street). These documents are accompanied by a LDAC Transaction Summary to assist the public reviewer in understanding their content. In addition, the Trust issued a press release at the time the LDAC development agreement was finalized, posted the press release on the Trust website, and announced the agreement in a Presidio Post newsletter article distributed to the Trust's mailing list of approximately 12,000,

IMPACT ASSESSMENT

EP-22. ***Programmatic Level of Analysis***

Several commentors, including two agencies and two environmental organizations, address the programmatic nature of the EIS and Plan. The NPS recommends that various elements of the Plan and EIS be modified to include additional specificity, and questions a statement in the Draft EIS regarding implementation of future projects following completion of the PTMP process. The CCSF Planning Department, while acknowledging that a programmatic document is appropriate at this juncture, expresses concern related to the "strongly-conceptual" nature of the document. The Sierra Club states that the "vague nature of the EIS in many areas makes it impossible for the Trust to conduct… proper environmental analysis, and prevents the public from considering the direct and cumulative impacts." The NRDC echoes a similar comment, and provides specific examples from the EIS. The NRDC also states that the Plan is vague and non-specific and it cannot substitute for review of the site-specific impact of any site-specific project.

Response EP-22 – The PTMP and EIS are first and foremost programmatic documents that have been prepared and analyzed at an appropriate level of specificity. In response to comments, the Plan and EIS presentation have been made more clear by drawing out specific assumptions embedded in the Draft EIS analysis. See also Response TP-1. The NPS recommends that the EIS include the upper and lower limits of a reasonable range of demolition, new construction and restoration and the corresponding location of each. The Draft EIS quantified and evaluated the maximum allowable demolition and new construction for each alternative. This information was provided on a Presidio-wide basis (refer to Table 1 in the Draft and Final EIS), and was supplemented by information on a planning district by planning district basis (in both the Plan and EIS). The latter was presented in the form of total existing built space (i.e., square footage) followed by the total proposed built space. In response to these comments, the maximum allowable new construction and demolition is specifically called out by planning district. See Chapter Three of the Final Plan, and Section 4.2 (Land Use) of the Final EIS. The Trust also modified and shifted the location of proposed construction under the Final Plan in response to public comment (i.e., the Final Plan proposes less new construction for Crissy Field than the Draft Plan).

It is assumed that the type of "restoration" referenced in the NPS' comment letter relates to natural habitat restoration. The Draft (and Final) EIS quantify proposed restoration activities (in acres) in Table 1, and the location of these areas are provided on the color land use maps in Chapter 2 of the EIS. The land use maps delineate the proposed location of "native plant communities" and "forest" to be rehabilitated, enhanced and restored. The GMPA and VMP (adopted by the NPS and Trust in 2001) served as the guiding documents in defining the location and extent of proposed restoration activities.

The NPS questions the Draft EIS statement that some projects will proceed directly to leasing and implementation following plan adoption indicating this combines a ". . . programmatic general plan with the authority for implementation of unlimited, and currently unspecified, actions." This interpretation of the statements provided in the Draft EIS is inaccurate, and the Trust provides the following clarification. Section 1.1 (Scope and Type of EIS) of the Draft (and Final) EIS establishes the framework in which the EIS was prepared, and outlines the scope and intended use of the EIS by the Trust in the future. The NPS correctly notes that in this section of the EIS, the Trust discloses that some projects will proceed immediately following completion of the PTMP process. This statement, however, does not provide for "unlimited, and currently unspecified, actions" as suggested by the NPS. On the contrary, the EIS specifically states that following completion of NEPA review, some projects that are determined to be consistent with PTMP may proceed. The EIS provides examples of the type of projects that would be considered under this category, including cultural programs, special events, historic building stabilization, certain environmental remediation activities, long-term leases that do not involve new construction and that are consistent with the preferred land uses described in the Final Plan, and natural resource restoration providing such actions are consistent with the VMP and PTMP. The EIS goes on to state that major projects and follow-on plans, including any district plans prepared, would be subject to additional NEPA review and public involvement. The EIS specifically states that future NEPA review would be required for future proposals involving new construction or

demolition. Also refer to Response PI-9 for additional discussion on this subject.

In the context of the above comments, the NPS also makes the following recommendations for changes to the Plan and EIS: include specific goals and objectives that support the plan vision, provide additional specificity on future planning, and more detail to allow for assessment of impacts to park resources and to discern the character of the planning districts. The Trust believes that sufficient detail is provided in the Plan and EIS to "discern the character" of districts and fully assess impacts on park resources. Nonetheless, in response to these recommendations, the following changes to the Final Plan and Final EIS have been made. The Final Plan has been refined to more clearly present its vision as well as the planning principles and district guidelines (goals and objectives) that will guide future implementation of the Final Plan. This refinement was done in part with input provided by the NPS and other commentors. Refer to Response VI-1 for additional discussion of this subject. At the request of the NPS and others, additional specificity on implementation activities and opportunities for public input was also incorporated into Chapter 4 of the Final Plan. Also see Response PI-2. Also in response to the NPS's request, additional information on future uses and the character of the various planning districts was incorporated into the Final Plan. See Chapters Two and Three, and the Final EIS, Section 3.4.1. The NPS comments on the level of detail provided in the impact analyses are addressed below.

The CCSF Planning Department states that in comparison to the GMPA EIS, the PTMP EIS is "strongly-conceptual" and questions the ability of the Trust decision-makers to make fully informed decisions and the public to have timely input into those decisions. The NPS, Sierra Club and NRDC express similar concern regarding the level of specificity provided in the environmental impact analysis. The Trust strongly disagrees with the City's assessment and comparison with the GMPA. The GMPA and GMPA EIS were in fact the models used by the Trust in preparation of the PTMP and PTMP EIS. Although the PTMP does not identify proposed uses on a building-by-building basis, it does provide a level of specificity that allows the Trust to adequately consider and evaluate the physical changes and subsequent environmental effects that would occur from implementation of the various alternatives. The EIS analysis is very specific and identifies total square footage (and/or acreage) of proposed land uses on a planning district basis, including maximum allowable new construction and building demolition, as well as the extent and location of proposed open space expansion and natural resource restoration. This information was used to inform the impact analysis, and the PTMP EIS quantifies wherever possible the environmental changes that would occur (beneficial and adverse) for all of the EIS alternatives. Examples of how the EIS quantifies these changes include the detailed transportation analysis which evaluates the future levels of service (LOS) at 37 different intersections within and adjacent to the Presidio. Dispersion modeling, relying on the Caltrans-approved CALINE4 model as well as guidance from the BAAQMD, was conducted for all EIS alternatives to evaluate localized concentrations of carbon monoxide (CO) at various intersections. For water supply and wastewater generation, the Presidio Water Balance model was used to predict future demands for each alternative. Other topics where the EIS provides a quantitative assessment of effects include housing demand, demand for school services, open space expansion and natural resource restoration, energy demand, effects on storm drainage system, financial/operations, and changes in the existing noise environment. These issues were quantified and assessed in a manner similar to the GMPA EIS, and in some instances the PTMP EIS provides an additional level of detail.

Where quantification of a particular effect was not possible, the EIS provides a qualitative assessment to ensure that these values are given appropriate consideration in the decision-making process and that the public is afforded an opportunity to provide meaningful review and input into that process. Overall, the Trust has made a good faith effort to fully evaluate the environmental effects of the PTMP alternatives and believes that the EIS appropriately and adequately analyzes these effects. The Trust also believes that the future, site-specific planning efforts will provide important additional opportunities for environmental review and on-going public involvement in the decision-making process. The review of future site-specific projects will be tiered from this EIS. See Section 1.1 of the EIS.

The NRDC specifically references two statements from the Draft EIS to demonstrate how it believes the EIS analysis is problematic. The first example relates to the assessment of effects on the National Historic

Landmark District. This issue is addressed in Responses HR-22 and HR-24. The second example relates to the analysis of biological resources, and the NRDC provides the following quote from the Draft EIS: "The precise effect of the landscape and institutional/residential uses would depend on the type and extent of development proposed within each of these areas…" The NRDC offers this as an example that "direct and indirect impacts cannot be predicted…" This quote was taken out of context. With supporting text, the Draft EIS states:

> "Under the Draft Plan alternative, the PHSH parking area and Nike Missile Site (above the Nike swale) would be used for landscape vegetation and institutional/residential uses, respectively. This area is proposed for native plant habitat restoration under the GMPA 2000 alternative. *The precise effect of the landscape and institutional/residential uses would depend on the type and extent of development proposed within each of these areas,* with the Nike Missile Site being less sensitive, as described below. The surrounding area contains jurisdictional wetlands and populations of the federally-endangered San Francisco lessingia. Possible effects could include increased threat of non-native invasive plant species, introduction of structures that would obstruct wind fetch from Baker Beach (necessary for viable San Francisco lessingia habitat), and a possible reduction and re-configuration in the size and/or function of an existing jurisdictional wetland habitat (riparian and fresh water marsh vegetation). As a secondary effect of the potential change in hydrology of the wetland, it is possible that the existing adjacent early successional native vegetation could be converted to more shrubby vegetation assemblages. Other potential effects include the possible reduction in annual plant species richness and available habitat for San Francisco lessingia. Future activities would be subject to the mitigation measures presented in this EIS, as well as site-specific planning and environmental review. The mitigation measures identified in this EIS require use of buffer areas to protect sensitive species, restrictions on the use of non-native invasive plant species, and implementation of best management practices. In addition, the Trust would require that any use proposed on the existing parking area be designed to avoid obstruction to wind fetch from Baker Beach. Any proposed landscape construction and operations in this area would also be designed or otherwise conditioned to minimize changes in the local hydrology such that the surrounding native vegetation would not be adversely affected…"

The above analysis identifies and evaluates potential direct and indirect effects of the proposed land uses (i.e., increased threat of non-native plant species, possible interference with wind fetch/indirect effect on San Francisco lessingia, and changes in the hydrology of a nearby wetland), identifies mitigation to minimize possible impacts to adjacent biological resources (which would be applicable to any future use of these areas), and is not vague or without specificity in its disclosure of potential direct and indirect effects resulting from this proposed change in land use. Please note that in response to public comment regarding these proposed land uses, the Trust has revised the Final Plan to redesignate the parking lot area from landscaped vegetation to native plant community. As a result, the corresponding impact analysis in the Final EIS has been updated and no longer appears as shown above. Refer to Response WR-7 for additional discussion of this issue.

EP-23. ***Impact Methodologies***

The Cow Hollow Neighbors in Action (CHNA) and NPS request that the EIS include a discussion of the methodology used in assessing the various impact topics. The CHNA also requests that any statistics or background information that corresponds to this information be provided in the EIS.

Response EP-23 – A discussion of methodology is provided at the beginning of each impact section in Chapter 4 of the EIS. In instances where the analyses involve complex methodologies and have corresponding background documents which support the EIS text, the EIS provides a general summary of the methodology and a cross reference to the relevant background document. In response to comments, the Trust reviewed and refined the discussion of methodology in the Final EIS. With respect to the comment on statistics or background information, the EIS either directly incorporates relevant data (in text or in the technical appendices) or references the source data. No specific mention of which "statistics or background information" that appear to be absent was provided, and none was evident to the Trust in reviewing the EIS.

EP-24. ***Analysis of Impacts Outside of Area B***

Several commentors state that the EIS should analyze the effects of the proposed PTMP beyond Area B of the Presidio, with an emphasis on traffic and parking effects. The NPS requests that the EIS assess the impacts on Area A and in particular on Crissy Field (traffic, parking, cultural resources and visitor experience). The CCSF Planning Department states that the EIS does not adequately address impacts on the City areas adjacent to the Presidio, City agencies, and the City as a whole. The City also states that the cumulative analysis is vague and inadequate, and that tenant agreements should be structured to ensure transit over vehicle use (not only within the park but as a means to get there). The Marina Civic Improvement and Property Owners Association endorses the City's comment letter, and one individual states that the EIS does not adequately address the impact of the proposed cultural and educational programs within the Presidio or within the already congested surrounding neighborhoods.

Response EP-24 – The EIS analyses in fact considers the impact of the various alternatives on Area A, in surrounding parts of the City, and on City agencies both in the project-specific analyses and also in the cumulative analysis. With respect to transportation impacts on areas outside Area B, 17 of the 33 study intersections analyzed in the Draft EIS are outside of the Presidio. As discussed in Response TR-6, the Final EIS has also been revised to include three additional intersections outside the Presidio in its analysis. The analysis includes consideration of all proposed land uses (for each PTMP alternative), including cultural/educational uses.

As stated in Response PK-1, the Trust's TDM Program goal is to minimize the transportation impacts of building occupancy and visitation at the Presidio as a whole by encouraging alternative modes to the automobile. The Trust believes that the TDM Program is the most effective way to minimize traffic and parking effects on Area B as well as Area A and surrounding residential neighborhoods. However, the Trust recognizes the potential parking demand impacts in Area A due to the Trust's TDM program, and as noted in Response TDM-4, realizes that coordinating the Trust's TDM Program with the NPS' TDM measures for Crissy Field (as described in the Crissy Field Plan EA, 1996) will be necessary to minimize any impacts on Area A. The Trust's TDM Program will help to minimize effects of additional traffic on surrounding neighborhoods, but some intersections may require physical changes to the intersections. As explained in Response TR-16, the mitigation measures described in the EIS would ensure that the operation of the intersections is maintained at an acceptable level of service and that delays are not excessive as determined by the CCSF Planning Department. The cumulative traffic analysis accounts for regional non-Presidio related growth at these study intersections. In response to the CCSF Planning Department assertion that the cumulative analysis is vague and inadequate, refer to Response TR-2. Based on more specific comments provided by the CCSF Planning Department, the PTMP Background Transportation Report has been revised to include more explanation of the cumulative transportation analysis.

With respect to the CCSF Planning Department's recommendations related to tenant lease agreements, the Trust concurs, as described in the proposed PTMP TDM Program. See Appendix D of the Final Plan. The park's non-residential tenants are already required to participate in the Trust's TDM program through their lease agreements, with specific TDM activities/programs required of all tenants. Tenant TDM activities must achieve the minimum standards established by the Trust for non-auto use, and each tenant is required to submit a TDM plan, which must detail how the tenant will achieve the minimum standard. Tenant employees will be surveyed periodically to ensure that incremental changes are made as necessary to meet the Trust's standards.

As far as impacts on cultural resources, the cultural resources analysis does consider the NHLD as a whole and thus inherently considers Area A resources. None of the PTMP alternatives would directly impact Area A cultural resources, and it is not clear what further effect, if any, the NPS is referencing. In response to other comments, the Trust has increased its commitment to preservation of the NHLD and made it a central feature of the Final Plan. The EIS analysis of cultural resources has been adjusted accordingly. Refer to the responses to comments regarding Historic Resources.

Other examples of how the EIS considers offsite impacts, including effects on City agencies, are provided in Section 4.4.2 (Socioeconomic Issues/Housing

Supply), which evaluates future employment and housing demands and the relative effect on the region. Section 4.4.3 (Schools) quantifies projected future demand for schools and evaluates this demand within the context of existing San Francisco Unified School District public school capacity. Section 4.6.2 (Wastewater) identifies projected future demand for treatment and disposal services, including an expanded discussion of the City's current system and corresponding flow volumes that was provided in the Final EIS in response to comments. Section 4.3.4 (Air Quality) evaluates localized concentrations of carbon monoxide at intersections outside of the Presidio (Area B) that would be affected by vehicles trips associated with the PTMP alternatives. Section 4.5 (Transportation & Circulation) considers and evaluates the effect on outside transit agencies by projecting future demand for transit service including Muni and Golden Gate Transit.

EP-25. ***Summary Table & Baseline of Comparison***

Several commentors, including USFWS, NPS, NRDC, and individuals, comment on the Summary Table presented in the Draft EIS. The USFWS comments primarily relate to the definition and use of the "baseline." The NPS states that the analysis should use the GMPA 2000 alternative as the baseline and that the Summary Table should not conflict with the Environmental Consequences chapter of the EIS. The NRDC questions the accuracy of several of the statements presented in the Summary Table. An individual recommends that the Summary Table be revised to clarify the references to mitigation measures.

Response EP-25 – In response to these comments, the Summary Table was reviewed and updated in the Final EIS. A footnote was also incorporated into the table to make clear that the Summary Table is provided as an aid to reviewers and that the table should be read in conjunction with the text of the Final EIS, Chapter 4. The footnote explains that the Summary Table attempts to summarize complex information into short statements, and that if discrepancies between the table and Chapter 4 occur, the information in Chapter 4 prevails. The footnote also refers the reader directly to Chapter 4 for a complete description of the mitigation measures referenced in the Summary Table.

The NRDC specially questions the validity of several Summary Table conclusions which state that the Draft Plan would have "similar" impacts as described for the GMPA 2000 alternative. In particular, the NRDC lists the conclusion statements provided under cultural landscape, archaeological resources, native plants, wildlife, water quality, visual resources, and "general construction/demolition emissions" and questions how the Draft Plan, which proposes more new construction and total built space, less demolition, more parking spaces and more daily visitors, could have "similar impacts." In an attempt to provide a succinct description of effects, the Summary Table relies on relative comparison to other alternatives where appropriate. In review of the referenced impact conclusion statements, the Trust notes that all but two provide supplemental text which was not mentioned by the NRDC but which the Trust believes is critical to the review and interpretation of the Summary Table. For example, the NRDC cites "archeological resources" as a topic for which the EIS concludes that the impact would be similar to the GMPA 2000 alternative. As presented in the Draft EIS, the Summary Table actually stated "Similar to GMPA 2000 alternative, with higher overall potential to adversely affect archaeological resources based on greater amount of new (replacement) construction. In particular, there would be greater potential for impacts in the East Housing Planning District where replacement housing may occur within the Tennessee Hollow riparian corridor." The Trust believes that this comparison, particularly given its location within the Summary Table, is appropriate and accurate. However, in response to the concerns expressed by the NRDC, NPS and USFWS, the Trust has reviewed and refined the Summary Table in the Final EIS with these comments in mind.

The NRDC also states that there is "...so little specific information" provided about the alternatives (including the Draft Plan) that "...the majority of the impact analyses are qualitative, not quantitative" and that there is no way for the reader to understand the conclusions that are made. The Trust disagrees with the NRDC's characterization of the impact analysis as predominately qualitative. Refer to Response EP-22 for a further discussion of this issue.

The USFWS notes that the "...benchmark for comparison shifts between existing conditions, GMPA 2000, and the Draft Plan alternative . . ." in the Summary Table. Although the USFWS correctly notes that the Summary Table often references other alternatives, these references were provided as a

means to quickly and succinctly compare and contrast impacts as explained above. Use of this comparison should not be confused with use of a baseline. The Alternatives section in the Summary Chapter and Sections 2.1and 4.1.1 of the Draft (and Final) EIS explain that the EIS analyzes the GMPA 2000 Alternative as the No Action Alternative pursuant to 40 CFR 1502.14(d), and that this is the baseline with which all alternatives are compared. Throughout Chapter 4 (Environmental Consequences), the analysis relies on the GMPA 2000 Alternative as the baseline and provides a sharp comparison between the effects of the various action alternatives and the GMPA 2000. In response to public comments, the Final EIS has been revised to further clarify that the GMPA 2000 Alternative is the No Action Alternative. With respect to the use of existing conditions, the EIS does periodically include reference to existing conditions. This information is provided for the reader's benefit, however, and is not used as a substitute for the baseline comparison to the No Action Alternative (GMPA 2000). The following is an example of how existing conditions are referenced in the EIS. In describing the increase in open space under a particular alternative, the EIS analysis may state that existing open space would be increased from "X" acres to "Y" acres; however, this would be a reduction in open space when compared to the No Action Alternative (GMPA 2000), which would provide "Z" acres.

EP-26. ***Significance Thresholds***

The NPS recommends that significance thresholds be incorporated into the methodology section of the EIS, and notes that "Of the 37 impact topics listed in the Summary Table, thresholds are provided for only 4 topics . . ." The USFWS notes that the EIS provides little or no explanation about why environmental impacts are significant or not, and states that this is particularly relevant for the analysis of endangered species and related habitat. The USFWS concludes that "...without specific explanation of how the Trust evaluates the weight of impacts, it may be difficult to understand how alternative plans are justified.

Response EP-26 – When a federal agency has decided to prepare an EIS, further "thresholds of significance" are not relevant or required under NEPA. The Trust has prepared the PTMP EIS, rendering the thresholds question irrelevant. Some explanation is necessary, particularly since another (state) law, the California Environmental Quality Act (CEQA) imposes somewhat different requirements that implicate such thresholds, and these may be familiar to agency reviewers. Developments under NEPA and CEQA, although the latter is patterned on the former, have diverged in several respects. One of these is that, while both laws require scrutiny of alternatives and mitigation in the pursuit of less environmentally intrusive ways of doing things, NEPA has come to place more emphasis on the rigorous examination of alternatives, while CEQA has come to emphasize mitigation. Under CEQA, even if an environmental impact report (EIR) is being prepared because there is a significant environmental impact, there is an obligation to mitigate each significant environmental impact to the extent feasible or to adopt a statement of overriding considerations as to why such an impact should be overridden if it cannot be feasibly mitigated or avoided. Thresholds of significance, therefore, assume a recurrent and pervasive importance under CEQA. NEPA imposes no such obligation. Significance of environmental impacts is, under NEPA, the principal criterion for whether an EIS is to be prepared (NEPA Section 102 (2)(C), 40 CFR Section 1508.27). If there is significance, one must be prepared; if not, no EIS is required. As such, when a NEPA environmental assessment (EA) is prepared (40 CFR Section 1501.4, 1508.9), the question of significance is usually the dominant one determining whether or not an EIS is required. But, once an EIS is determined to be needed, the question of significance is no longer relevant (except insofar as the more significant the impact, the more study and analysis is apt to be required). The U.S. Supreme Court has held that mitigation is not required by NEPA (unlike, for instance, CEQA) (Robertson v. Methow Valley, 49 U.S. 332 (1989)). Therefore, while under CEQA any impact found to be significant must be mitigated, under NEPA no such obligation attaches, removing the need for a post-EA significance determination and therefore for "thresholds of significance."

In drawing attention to the Supreme Court's holding, the Trust intends in no way to diminish the importance it attaches to mitigation and the importance of discussing it in the EIS (40 CFR Section 1502.14 (f), 1502.16 (h), and 1508.20), and of the requirement set by the Court of Appeals for the Circuit within which the Presidio is located, which provides that if mitigation is adopted by the agency, it is enforceable (Tyler v. Cisneros, 136 F.3d 603 (9th Cir. 1998)).

In brief, while impacts are to be discussed in proportion to their significance – which the Trust believes it has done – there is no requirement under NEPA, once the decision has been made to prepare an EIS, to establish thresholds for significance. See CEQ, Forty Questions, Q. 19a; mitigation obligations not dependent upon significance of impacts.

In response to these comments, additional explanation of the factors used in evaluating the relative significance of various impact topics have been incorporated into the methodology sections of the Final EIS, as appropriate. In particular, the methodology section provided in Section 4.3.1 (Biological Resources) has been expanded in response to the USFWS' request. The Trust believes that a description of these factors in the methodology section is appropriate and improves the Final EIS, and appreciates the USFWS careful review of the Draft EIS. This expanded discussion does not, however, constitute the formal definition of "significance thresholds," which is not required under NEPA as described above.

With regard to the NPS's comment on the summary table, the following clarification is provided. The NPS notes that of the 37 impacts identified in the Summary Table, only four (wastewater, natural gas, energy conservation and Trust operations) identify "thresholds." Indeed the Summary Table provides quantification of the four referenced impact topics, however, there is no mention of "thresholds" and it is assumed that the NPS is instead referring to the quantification of the effect. The Draft EIS version of the Summary Table actually quantified a number of additional impact topics that were not mentioned by the NPS, including but not limited to the summary statements for air quality, noise, transportation (i.e., local roadway congestion, parking demand and supply, pedestrian and bicycle facilities, transit demand), socioeconomic/housing, schools, and solid waste.

EP-27. ***Inaccuracies & Inconsistencies between Plan and EIS***

Several commentors state that "inaccuracies" or "inconsistencies" are presented in the Draft EIS. The NPS states that the level of detail in the impact analysis does not reflect the specific information and assumptions expressed in other parts of the Plan and EIS. The CCSF Planning Department generally states that there are inconsistencies and data errors in the Draft EIS and directly references one example of an inconsistency between the GMPA transportation report and the PTMP transportation report. The NRDC and PAR both note that the Draft EIS appears to give more specific details on certain aspects of the Draft Plan than does the Plan document, creating "confusion" as to what would be decided if both documents were approved in their present form. The NRDC notes that readers are not told which of the two documents is controlling. The NRDC also points out three inconsistencies within the Draft EIS related to air quality analysis, water demand, and presentation of cultural/educational square footage.

Response EP-27 – Commentors correctly note that in some cases a greater level of detail is provided in the Draft EIS than in the Draft Plan. The Plan document is intended to serve as an updated land use policy framework for Area B. As such, it provides the vision statement for Area B and corresponding goals and guidelines that will be used by the Trust to implement the Plan over time. In the EIS, the Trust analyzed and quantified, to the greatest extent possible, the environmental effects of the Plan and a reasonable range of alternatives. The approach used was to develop land-use (such as future vehicle trips) assumptions based on full implementation for each of the alternatives and to conduct specific – and mostly quantitative – assessments based on these assumptions. Similar to the process used for the GMPA EIS, the Trust made a variety of land-use assumptions for each alternative not only to enable the effects to be quantified, but also to provide for an equal level of analysis for each of the alternatives, and thus allow the public and Trust decision-makers to compare and contrast the various alternatives. Also see Response EP-22 and EP-31.

The NRDC identifies two areas where the Draft Plan proposes different land uses than the No Action Alternative (GMPA 2000), and notes that "...it is the EIS, not the plan" which reveals this difference. The EIS reveals this difference through the environmental evaluation of the alternatives, which the Trust believes is the appropriate location for this discussion to occur. The two areas in question (an existing parking lot and the former Nike Missile site) are located near the PHSH, and based on their proximity to a nearby wetland and special status plants, were called out in the EIS analysis of biological resource effects. The EIS appropriately identifies the potential indirect impacts associated with the changed land use as compared to the No Action Alternative (GMPA 2000). All of the PTMP alternatives propose differing

land uses in the PHSH area, and thus the analysis compares and contrasts these differences. Please note that through the public review process, the Trust received feedback from the public regarding these proposed land uses and in response to public concern has modified the Final Plan. Refer to Response WR-7. It was in fact the Draft EIS's disclosure of this difference and subsequent environmental effects that prompted the public comment and thus the refinement of the proposed action. The Trust believes this is good NEPA practice.

With respect to the question of which document would be the "controlling" document, the following clarification is provided. The proposed action is the PTMP, as described in the Final Plan. The EIS is the review document which evaluates the environmental impacts associated with the Final Plan and a range of alternatives. The Trust Board of Directors will review and consider the contents of both documents in their decision-making. If the Trust Board of Directors determines that the Final EIS is adequate and complete, it may take action on the Final Plan. If the Board adopts the Final Plan, then the Plan will be the "controlling document" along with any adopted mitigation measures. An explanation of this decision would be provided in the Record of Decision in the future. Refer to Response EP-34. The NRDC concludes its comments on this subject with a statement indicating that the "lack of notice and explanation" regarding which document is controlling has compromised the ability of the public to comment. The cover sheet, Summary Chapter, Chapter 1 (Purpose & Need), and Chapter 2 (Alternatives) of the Draft EIS are all explicit in their discussion of the relationship of the Draft Plan and Draft EIS. The EIS is straightforward in its description of the function of the EIS as an environmental review document analyzing the impacts of the proposed action (Draft Plan) and a range of alternatives. With respect to providing adequate notice and opportunities for the public to comment, the Trust conducted a six-month public scoping process (including four public workshops), followed by a voluntarily extended three-month public comment period during which the Trust held two public hearings on the Draft Plan and Draft EIS; and a third hearing was held by the GGNRA Citizen's Advisory Commission. All of these activities were adequately noticed using a variety of means including but not limited to the Federal Register, posting on the Trust's website, formal mailing, advertisement in the Presidio Post (which has a mailing list of more than 12,000 people, organizations and agencies interested in the Presidio), and other methods.

In its comment letter, the CCSF Planning Department specifically references an inconsistency between the Draft EIS transportation analysis and the 1994 GMPA Transportation and Planning Analysis Technical Report. This issue has been addressed in Response TR-11. The CCSF Planning Department also makes a general reference to other inconsistencies, but does not provide any other examples and instead defers to various attachments. The attachments to the CCSF Planning Department letter have been reviewed and are responded to throughout this volume of the Final EIS in a manner similar to the Response TR-11 referenced above.

The NRDC also cites three apparent inconsistencies within the Draft EIS text. The first relates to the air quality analysis and assessment of consistency with the Clean Air Plan (CAP), comparing statements from the Summary Table and the cumulative impact analysis (Section 4.8). The conclusion that the potential increase in air emissions would be a significant and unavoidable cumulative impact is not inconsistent with the Summary Table because the purpose of the Summary Table is to addresses PTMP impacts only. The Summary Table does not summarize cumulative impacts, which are discussed in Section 4.8 of the EIS. In the analysis of the cumulative effects, the Trust conservatively assumed a significant and unavoidable cumulative impact. This conclusion was based on the fact that other regional growth, land use trends, and transportation projects that are outside the control of the Trust must be considered in conjunction with the PTMP-related growth. Section 4.8 of the Final EIS was revised to make this more explicit.

The second inconsistency cited by the NRDC relates to projected water demand. The NRDC correctly notes that that there was an inconsistency between Section 4.6.1 and Appendix G in the Draft EIS. Section 4.6.1 correctly stated that the Draft Plan would have approximately 2 percent lower projected water demand than the No Action Alternative (GMPA 2000). Appendix G (which provides the backup calculations for future demands), however, shows that the No Action Alternative (GMPA 2000) would have a lower water demand than the Draft Plan. The discrepancy is based on an error that was made in Appendix G. As shown in Table 1 of Appendix G, the water

demands associated with residential use were accidentally marked "na" under the No Action Alternative (GMPA 2000), which is incorrect because approximately 1,660 residents would be living in Area B under the No Action Alternative (GMPA 2000). In response to other public comments on the analysis of water demand and supply, this section and the corresponding appendix have been updated and refined in the Final EIS. Through this refinement, the No Action Alternative (GMPA 2000) was found to have slightly lower water demands than the Final Plan. Refer to Response UT-1 and Final EIS Section 4.6.1 and Appendix H (Water Demand) for additional information.

The third inconsistency noted by the NRDC relates to the amount of cultural/educational uses proposed under the Draft Plan. The NRDC correctly notes that Table 1 and Attachment A of Appendix J in the Draft EIS show differing square footages for this proposed land use. Appendix J presents technical background on the assumptions that were used in the preparation of the financial model and assumed inputs to the model. Attachment A (from Appendix J) shows a lower total amount of square footage for cultural/educational uses under the Draft Plan than does Table 1 of the EIS. The reason for the difference is that the square footage assumptions presented in Appendix J remove space that is assumed to be used by the NPS or Trust for cultural/educational purposes as these uses would not generate revenue in the form of rent, and thus should not be calculated as revenue generating in the financial analysis.

MITIGATION

EP-28. *Effectiveness and Impact Assessment of Proposed Mitigation*

Several commentors request additional information on the EIS mitigation measures, question their relative effectiveness, or state that the associated impacts are ignored in the EIS. The CCSF Planning Department states that the EIS should consider the economic, environmental, logistical, technological, legal, and social feasibility of each mitigation measure and identify the secondary environmental effects that might occur from implementation of the mitigation measures. The CCSF Planning Department also states that mitigation measures presented in the Draft EIS are "...vague, rely on compliance with existing regulations, and monitoring at some future time or development of specific mitigation programs at a future date..." and provides several specific examples related to transportation mitigation. Both the CCSF Planning Department and the NRDC are critical of the EIS's identification of mitigation measures that are outside the jurisdiction of the Trust. The NRDC states that many of the mitigation measures "...will themselves have environmental impacts, those impacts are ignored" and specifically references the water recycling project and use of cogeneration for energy production. One individual asks the Trust to clarify what Trust-funded mitigation measures would be both within and outside the park, and the timeframe and cost for each mitigation. The Cow Hollow Neighbors in Action asks how the Trust plans to mitigate impacts.

Response EP-28 – As a preface, the Trust believes that some explanation is necessary, particularly since another (state) law, CEQA, imposes somewhat different requirements related to mitigation and the Trust suspects that some of the commentors are more familiar with practice under CEQA than under NEPA. Developments under NEPA and CEQA, although the latter is patterned on the former, have diverged in several respects. One of these is that, while both laws require scrutiny of both alternatives and mitigation in the pursuit of less environmentally intrusive ways of doing things, NEPA has come to place more emphasis on the rigorous examination of alternatives while CEQA has come to emphasize mitigation. Under CEQA, even if an environmental impact report (EIR) is being prepared because there is a significant environmental impact, there is an obligation to mitigate each significant environmental impact to the extent feasible or to adopt a statement of overriding considerations as to why such an impact should be overridden if it cannot be mitigated or avoided. NEPA imposes no such obligation. The U.S. Supreme Court has held that mitigation is not required by NEPA (unlike, for instance, CEQA) (Robertson v. Methow Valley, 49 U.S. 332 (1989)). Therefore, while under CEQA any impact found to be significant must be mitigated, under NEPA no such obligation attaches. In drawing attention to the Supreme Court's holding, the Trust intends in no way to diminish the importance it attaches to mitigation and the importance of discussing it in the EIS (40 CFR Section 1502.14 (f), 1502.16 (h), and 1508.20), and to the requirement set by the Court of Appeals for the Circuit within which the Presidio is located, which provides that if mitigation is adopted by the agency, it is enforceable (Tyler v. Cisneros, 136 F.3d 603 (9th Cir. 1998)).

EISs are required to include discussions of mitigation by one of several means – inclusion in the proposed action, inclusion in alternatives to the proposed action, consideration as part of the alternatives section of the EIS, or consideration as part of the environmental consequences section (40 CFR Sections 1502.14 (f), 1502.16 (h)). Potential mitigation measures run a gamut from avoidance to compensation (40 CFR Section 1508.20). At the end of the NEPA process in Records of Decision (RODs), agencies considering mitigating measures are either to adopt them along with appropriate monitoring and enforcement measures or to explain why they did not do so (40 CFR Sections 1505.2 (c), 1505.3). The Supreme Court has made clear that NEPA does not require an agency to adopt, as distinguished from consider, any mitigation. As required by law, the Trust has in fact devoted considerable effort and attention to mitigation measures. Going beyond what is required by law, the Trust is prepared actually to adopt needed mitigation and the means to monitor and enforce it. The Trust is fully committed to implementing all of the mitigation described in Chapter 4 of the Final EIS, and as is customarily the case, the ROD will provide the occasion for doing so.

At the end of each impact analysis in Chapter 4 of the Draft (and Final) EIS, the Trust presents mitigation measures that it proposes to implement in order to avoid or reduce the environmental effects associated with the various PTMP alternatives. As shown in each mitigation section, the Trust first reviewed and incorporated all relevant mitigation measures from the GMPA EIS, and then identified additional measures that could be implemented to further reduce potential impacts on the human environment (see the "Mitigation Measures" discussion presented at the end of the following EIS sections: 4.2.1 (Historic Architectural Resources and the Cultural Landscape), 4.2.2 (Archaeology), 4.3.1 (Biological Resources), 4.3.2 (Water Resources), 4.3.3 (Visual Resources), 4.3.4 (Air Quality), 4.3.5 (Noise), 4.4.1 (Land Use), 4.4.2 (Socioeconomic Issues/Housing Supply), 4.4.3 (Schools), 4.4.4 (Visitor Experience), 4.4.5 (Recreation), 4.4.6 (Public Safety), 4.5 (Transportation and Circulation), 4.6.1 (Water Supply and Demand), 4.6.2 (Wastewater Treatment and Disposal), 4.6.3 (Storm Drainage), 4.6.4 (Solid Waste), 4.6.5 (Energy Consumption and Distribution), and 4.7 (Presidio Trust Operations)).

With respect to comments related to the mitigation measures themselves creating environmental impacts, the following response is provided. For mitigation measures that involve activities that could potentially themselves generate environmental effects beyond those described in the EIS, the Trust would conduct the necessary environmental review. The NRDC specifically references the proposed water recycling project and the use of cogeneration technologies. The Trust has already prepared and released for public review and comment a separate Environmental Assessment (EA) which analyzes the environmental effects (adverse and beneficial) associated with the proposed water recycling project. The use of recycled water was originally identified in the 1994 GMPA, and the water supply and demand analysis presented in the Final EIS therefore assumed the use of recycled water at the Presidio. The GMPA assumed that recycled water would be provided by the City and County of San Francisco. Since release of the GMPA, however, the City's plans to construct and operate a regional water recycling plant have not moved forward. In preparing an EA for the project, the Trust has ensured that the associated environmental effects are fully disclosed, given due consideration by the public and Trust decision-makers, and will play a role in the decision-making process. Refer to Responses UT-1 and UT-5 for additional information on this subject. With regard to future proposals associated with the cogeneration, the Trust would similarly conduct necessary environmental review at the time such projects are proposed for implementation. Like the water recycling project, this review would be done in accordance with NEPA, the CEQ's Regulations implementing NEPA (40 CFR 1500 through 1508), and the Presidio Trust Environmental Quality Regulations (36 CFR Part 1010).

The CCSF Planning Department and NRDC's criticism of the EIS' identification of mitigation measures that are outside of the Trust's jurisdiction is at odds with CEQ's direction concerning mitigation. CEQ states "All relevant, reasonable mitigation measures that could improve the project are to be identified, even if they are outside the jurisdiction of the lead agency or the cooperating agencies, and thus would not be committed as part of the RODs of these agencies" (CEQ, Forty Questions, Q. 19). The effect can be to alert the agencies or officials who can implement these extra measures and encourage them to do so (Id). The EIS and ROD should, as part of this, indicate the likelihood that any mitigation recommended will be enforced (Id).

The practice of identifying mitigation measures regardless of the agency with jurisdiction is common in a CEQA as well as a NEPA context, and the City's recent EIR regarding the Mission Bay project includes many examples.

With respect to the CCSF Planning Department's specific comments on transportation mitigation, please refer directly to Response TR-5, which addresses this issue. With respect to the inquiry regarding mitigation funding and timing, the Trust has not prepared detailed cost estimates for the mitigation measures. Although many of the measures are explicit about the timing for implementation (i.e., prior to construction, or during design review, etc.), others are not. Through the forthcoming Record of Decision document, the Trust will establish the timing for all adopted mitigation measures.

EP-29. ***Mitigation to Avoid Adverse Impacts***

The NRDC asserts that the Trust erred in using proposed mitigation to, in the commentor's terms, mask proposed impacts.

Response EP-29 – The comment betrays a misunderstanding of what mitigation is. Putting aside the pejorative term "mask," it is the alleviation of adverse impacts that is the very essence of mitigation. The term includes avoidance of impacts, minimizing impacts, rectifying the impacts, reducing or eliminating the impact over time, and compensation for impacts by replacing or providing substitute resources or environments (40 CFR Section 1508.20). The Trust is explicitly required to consider such mitigation (40 CFR Sections 1502.14(f), 1502.16 (h)).

The Draft EIS impact analysis discloses the environmental effects of each alternative *before* mitigation. A summary of relevant mitigation measures is provided at the end of the analysis of each alternative. See Response EP-28. This discussion focuses on the measures that would be implemented by the Trust to minimize or avoid the impacts discussed, and serves as introduction to the subsequent mitigation section. This summary is not used as a substitute for the disclosure of impacts or to replace the list of mitigations, merely an aid to the reader.

The NRDC provides specific examples from the Draft EIS in asserting that the Trust uses mitigation to "mask" impacts. The Trust carefully reviewed each example, and provides the following clarifications. The first example listed by the NRDC relates to the analysis of cumulative effects on historic resources and the cultural landscape. The NRDC questions how the Draft EIS can conclude that the cumulative impact of new construction would be less than significant based on the following: (1) the analysis relies on the "cap" of square footage which the NRDC states may be exceeded according to the Draft Plan (pg. 141); (2) a commitment to enforce planning principles and planning guidelines is described but the NRDC notes that these provide "no protection" and "contain few real limitations or constraints" listing specific examples from the PHSH principles and guidelines; and (3) the NRDC states that consultation under the National Historic Preservation Act is just that – consultation and that it does not guarantee that adverse impacts will not occur.

In response to this and other public comment, the discussion of the "cap" on square footage was revised in the Final Plan to state that the maximum square footage would be 5.6 million *or less.* Please refer to Chapter Four of the Final Plan, and Response NC-8 for further discussion. This "cap" – and for that matter the "cap" of 5.96 million square feet provided by the Trust Act – is sufficient to ensure no substantial impacts due to new construction when viewed together with the other constraints provided by the Trust Act and the Plan. These include the commitment to protecting the integrity of the NHLD, the requirement that new construction only occur to replace building square footage that is removed, and only occur in already developed areas in accordance with the planning guidelines and procedures articulated in the Final Plan.

With respect to the NRDC's comments on the planning principles and planning guidelines, the Trust believes that conformance to these guidelines will reduce the impact of future rehabilitation and reuse of historic buildings and new construction. The planning guidelines were specifically developed to conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties and with Guidelines for the Treatment of Cultural Landscapes. For a discussion of issues related to the development and specificity of the planning guidelines. See Response PG-1. The Trust concurs with the NRDC's statement that consultation under the National Historic Preservation Act in itself does not guarantee avoidance of adverse impacts. The section of the Draft EIS quoted by the NRDC does not make this

statement; rather it references Section 106 consultation as one of several actions that will be taken by the Trust. Also refer to Response EP-30 which discusses the role of consultation can play in mitigating impacts.

The second example provided by the NRDC relates to the analysis of visual character. The NRDC provides an excerpt from the Draft EIS which states "cultural resources mitigation measures adapted from the GMPA EIS would ensure that development would be compatible with the character of existing historic structures in the Presidio and that the visual character of the Presidio would not be substantially altered." This statement was taken from the analysis of visual character, and the word "Furthermore," precedes the statement shown above. The NRDC goes on to state that the measures referenced do not in fact require protection of the Presidio's fabric. On the contrary, the mitigation identifies compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties as provided in the Final PA. Concern related to the use of the phrase "maximum extent feasible" in this context was raised by other commentors, and a detailed response is provided in Response HR-3. With respect to the analysis of visual character, the Trust believes that implementation of the mitigation measures presented in the Cultural Resources section as well as conformance to the Secretary of the Interior's Standards would be effective in preserving the visual character of the Presidio. The NRDC also discusses the use of the Transportation Demand Management Program as an assumption in the analysis of traffic effects. Again, this issue was raised by others, and a comprehensive response is provided in Response TDM-11 and the Final EIS was updated accordingly.

EP-30. ***Procedural vs. Substantive Mitigation Measures***

The USFWS states that even in program EISs, mitigation measures should focus on real, causal relationships between physical or biological impacts and efforts to avoid, minimize, or offset them. The USFWS concludes that indefinite and purely procedural mitigation measures should not be proposed in lieu of substantive mitigation measures. For example, Mitigation Measure NR-4 relies on "review" or "focus" of future planning to "ensure consistency with" endangered species recovery plans. In contrast, Mitigation Measure NR-5 and UT-1 refer to a suite of specific, substantive actions which can be evaluated in terms of appropriateness and effectiveness at addressing their relevant impacts.

Response EP-30 – There is nothing in NEPA or in the CEQ Regulations that implement it that bar or even discourage "procedural" as distinct from "substantive" mitigation. The basic and critical question is whether the measure will mitigate the impact.

Procedural mitigation is both common and commendable. A recurrent example involves historic preservation and potential archaeological sites. Beyond near-surface sampling on the site of proposed construction, there may be no means of knowing whether artifacts will be uncovered during excavation until the excavation actually takes place (i.e., until the project has been approved and construction has begun). The usual means of mitigation is for the historic preservation agencies and the lead agency to enter into a memorandum of agreement in advance of project approval that sets out the procedural mechanisms for consultation and possible recovery should artifacts be found during excavation and construction. In sum, procedural mechanisms have historically provided valuable mitigation mechanisms.

The Trust believes it has in the Final EIS set out the proposed mitigation measures with a degree of specificity appropriate for this program EIS (from which other site-specific NEPA documents will be tiered).

With respect to the USFWS's specific comment, the full text of the referenced mitigation measure (NR-4) states:

> "NR-4 *Special – Status Species.* Rare or endangered plant species, including any federal- and state-listed threatened and endangered species that are found to occur in the Presidio, would be monitored annually and protected. Identified actions would be taken to recover these species, and their habitats would be enhanced. Any future rare or endangered species found on the Presidio would also be afforded the same protection and restoration measures. All special-status wildlife would be inventoried and monitored, and habitat would be protected and restored. Restoration activities would focus on actions identified in USFWS Recovery Plans necessary to recover the five federally-listed plant

species found on the Presidio, and restore their associated habitat in compliance with the FESA. During future site-specific planning and environmental review, the Trust would review future projects to ensure that proposed uses and activities are consistent with and help further the recovery objectives stated in the adopted Recovery Plans."

This is only one of many measures listed in the EIS, and the Trust believes that consistency with relevant Recovery Plans and protection of special status, species is important and should be directly discussed in the EIS. The Trust's efforts to work cooperatively with the USFWS to anticipate the boundaries of the Draft Recovery Plan for Coastal Plants of the San Francisco Peninsula, which was not released until well after the Draft Plan and Draft EIS, further demonstrates this commitment.

MAKE EXPLICIT

EP-31. *EIS Assumptions*

Several commentors ask questions related to the assumptions made in defining alternatives for the purposes of the EIS analysis, and how these assumptions relate to the Plan. SPUR notes that, as is typically done, the Draft EIS has conducted some very detailed analyses (e.g., traffic) based on assumptions developed for the Draft EIS and recommends that these assumptions be transferred from the appendices to the project description. The NRDC states that the Trust should provide building-specific information in the EIS, and notes that this information is necessary to enable reviewers to understand and evaluate the actual "on the ground" character of each alternative. The Cow Hollow Neighbors in Action inquire as to the specific assumptions made for each existing building use, square footage, parking, potential visitors, number of workers and vehicles, delivery trucks, buses, and construction vehicles. The CHNA also asks if these assumptions represent a worst-case scenario, and if so, what the Trust will do to mitigate cumulative noise impacts. The Neighborhood Association for Presidio Planning questions how the totals for overall building square footage were generated and how such numbers could be provided without a specific idea of what would be built and how the existing buildings might be used.

Response EP-31 – The Trust has analyzed and quantified, to the greatest extent possible, the environmental effects of the various programmatic EIS alternatives. This approach provides the Trust decision-makers and the public with a comprehensive assessment of environmental effects, and ensures that this information is considered in the PTMP decision-making process. In order to translate the Plan – a land use policy framework similar to a general plan – into a project description that provides adequate specificity to allow the Trust to quantify environmental impacts, assumptions related to the square footage of various land uses were made. These assumptions represent hypothetical reasonable possibilities, and it should be understood that there are many alternative ways in which the land use mix for each alternative could reasonably be achieved.

Commentors suggest that the Trust used building-specific information to prepare the EIS and should therefore convert these assumptions into decisions about building-specific uses and treatments. In the course of developing PTMP's general land-use framework, Trust staff did indeed consider the number, size, layout and other characteristics of buildings within each planning area in order to develop rational assumptions about the overall land use possibilities within an area and the square footage framework. This type of information had to be taken into account because the Trust is constrained under the terms of the Trust Act to a Presidio-wide square footage cap and each planning alternative itself was also constrained by its own square footage cap. So that each planning alternative remained within its square footage constraint or within the overall Presidio-wide square footage cap, the Trust had to make assumptions, not decisions, about the potential treatment of buildings or building clusters. In most cases, many such assumptions were made or possible within the district-wide land use totals, and any building-specific assumptions that may have been made for purposes of the various EIS analyses or for purposes of generating reasonable aggregate values are merely that – working assumptions based on staff's educated estimates – which do not, however, purport to prejudge the Trust Board's decision-making when site-specific plans or projects become ripe for decisions.

In other words, no single set of underlying assumptions, even if made for purposes of the EIS analysis, represents or should be construed as actual building-specific or site-specific land use decisions that will, with certainty, be

implemented by the Trust. Instead, decisions about specific building treatments will be made on the basis of financial evaluations that address real world proposals, consistent with the overall land use plan and policy objectives established in PTMP. Also refer to Responses IM-1 and EP-30 for additional discussion.

In response to comments, the Trust has incorporated additional specificity into the Final Plan and clarified the information included in the Final EIS. In addition to the tables and figure provided in Chapter 2 (Alternatives) of the Draft EIS, the Final EIS was modified to include two additional tables. See Section 4.4.1 (Land Use). One presents proposed land uses for each alternative on a planning district basis, and the other shows proposed new construction and demolition also on a planning district basis for each alternative. These tables are derived from tables included in the financial appendix of the Draft EIS and better articulate underlying land use assumptions of the EIS analysis.

With respect to additional items listed by the CHNA (i.e., number of workers, etc.), please refer to Table 1 (Chapter 2), and Appendix G of the Final EIS, and the PTMP Background Transportation Report (Wilbur Smith Associates, 2002). The CHNA also inquires as to whether the assumptions made in preparing the EIS represent a "worst case" scenario and if so, what will be done to mitigate cumulative noise impacts. As described above, the assumptions, while hypothetical, represent a reasonable best guess. A prior CEQ Regulation requiring analysis of the "worst case" was repealed by CEQ, and that repeal was upheld by the Supreme Court. Agencies are now required to take a "hard look" at the consequences of the proposed actions, focusing on reasonably foreseeable impacts. The intent is "...to generate information and discussion on those consequences of greatest concern to the public and of greatest relevance to the agency's decision," rather than distorting the decision-making process by overemphasizing highly speculative harms (Robertson v. Methow Valley Citizens Council, 490 U.S. 332 (1989) and Cohen, M. William, 2001). With regard to mitigation of noise effects, please refer directly to the mitigation measures at the end of Section 4.3.5 in the Final EIS.

EP-32. ***Provide Background Documentation for Attachment A to Appendix J***

The NPS requests an explanation describing the development of building caps, demolition caps, etc. in Appendix J. The CCSF Planning Department asserts that all the alternatives in the Draft EIS rely on Attachment A to Appendix J, a chart containing square footage subtotals for different categories of use in different areas of the Presidio, and further asserts that Attachment A is completely conclusory. The CCSF Planning Department states that the Draft EIS failed to include any background documentation on the development of Attachment A, and failed to indicate which buildings were used to make up the different category subtotals. They maintain that without detailed information to support the square footage calculations, no verification is possible, and the Draft EIS conclusions on square footage cannot be cross-referenced to particular buildings.

Response EP-32 – The Presidio Trust Act establishes the overall building cap for Area B of the Presidio. Each of the PTMP alternatives propose varying levels of building space, demolition and new construction. As such, they provide the public and decision-makers with a range of alternative to consider, ranging from the Final Plan Variant that proposes no new construction, and a total of 4.7 million square feet of built space to the Minimum Management and Cultural Destination Alternatives that propose the maximum allowable built space of 5.96 million square feet. Refer to Responses EP-31 and NC-8 for additional information on this subject.

The CCSF Planning Department correctly notes that the hypothetical land use assumptions used in the financial model were also the basis for assumptions used in other EIS topics that quantitatively analyzed effects (i.e., traffic, air quality, noise, energy demand, etc.). In many instances, the assumptions presented in Attachment A (of Appendix J) had to be refined when used for purposes other than the financial model. For example, the assumption related to the amount of cultural/educational square footage in the financial model was lower than the square footage of this use assumed in other EIS topics. It was lower because some non-revenue generating space is not factored into the financial analysis but would be assumed for purposes of other impact topics. For example, in assessing projected future water demands, vehicle trips or

other operational effects, non-revenue generating built space was necessarily added back and factored into the analyses. The EIS and/or supporting technical appendices provide the background calculations and input used in predicting quantifiable impacts.

With respect to the CCSF Planning Department's statement that without building-specific information it would be impossible at this stage to definitively determine precisely which buildings would be expanded, renovated or demolished, the Trust concurs. The intent of the PTMP is not to provide a prescriptive building-by-building treatment for each of the buildings within Area B. The intent is to update the land use policies for Area B and establish a policy framework for future actions and proposals. As such, the PTMP establishes the overarching planning concepts for each planning district within Area B, and supplements these concepts with detailed planning guidelines. The planning guidelines conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties and will be used to guide future land uses along with subsequent site-specific planning and environmental review processes. In many ways, the PTMP is similar to the City's *San Francisco General Plan.* Not only would it be impracticable, but also unreasonable to establish on a building-by-building basis the treatment of every structure within the City limits in the San Francisco General Plan. Attachment A of Appendix J requires no "background documentation" because it is merely a set of assumptions – not decisions – and the square footages it includes could be derived in a number of ways. See Response EP-31.

RECIRCULATION

EP-33. ***Recirculation of the EIS***

A few commentors request that the Trust undertake to supplement the Draft EIS and recirculate it before proceeding to a Final EIS and Record of Decision. They state that the Draft EIS should be reissued with an additional period of time for public comment and public hearings, and that the Presidio Trust Board should have more public hearings on the Draft EIS.

Response EP-33 – The CEQ NEPA Regulations set out the criteria for supplementing or recirculating the EIS. None apply here. With respect to supplementing the EIS, such action is required if the agency makes "substantial changes in the proposed action that are relevant to environmental concerns" (40 CFR Section 1502.9 (c)(1)(i)) or if there are "significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts" (40 CFR Section 1502.9 (c)(1)(ii)). None of those criteria apply here. While the comment process assumes a responsiveness to comments and changes to the proposal, all such changes are anticipated to be well within the bounds of what has already been evaluated in the NEPA process. Similarly, while circumstances always change with time and more information always becomes available, nothing has happened to require starting anew under the criteria set out in the CEQ Regulations.

With respect to recirculation, when a Draft EIS "is so inadequate as to preclude meaningful analysis," the agency is to prepare and recirculate a revised draft of the appropriate portion (40 CFR Section 1502.9 (a)). The PTMP EIS is thorough and has elicited incisive and meaningful comment – exactly what it was supposed to do. The meaningful comments that have been made rebut the assertion that it was so inadequate as to preclude them.

In preparation of the EIS, the Trust conducted an extensive public outreach and involvement. At the request of the public, the Trust provided additional public workshops/hearings and an extended, six-month scoping period. During the review of the Draft Plan and EIS, the public requested additional time to review and comment on the draft documents. In response, the Trust extended the original 60-day review comment period to a full three months (90 days), again going well beyond legal requirements. In addition to accepting written comments, the Trust conducted two public hearings to solicit oral comments on the draft documents and participated in a third hearing hosted by the GGNRA Citizens' Advisory Commission. Refer to Section 5.1 of the Final EIS for additional discussion on the history of public involvement in the PTMP planning and environmental review process. Also refer to Response EP-3, and the responses under Public Involvement.

RECORD OF DECISION

EP-34. ***Record of Decision***

The Planning Association for the Richmond requests clarification on "what is to be decided in the future Record of Decision." The NPS states that the Draft EIS should include a discussion of how the various alternatives meet the project objectives as presented in the EIS.

Response EP-34 – Federal agencies prepare a Record of Decision (ROD) at the conclusion of the EIS process. The ROD provides a concise public record of the decision including a statement of what the decision was. In the case of the PTMP, this would be adoption of the Final Plan or another alternative and/or the conditional adoption of a particular alternative. RODs also provide a description of the range of alternatives considered in reaching this decision (including specification of an environmentally preferable alternative(s)), relevant factors which were balanced in reaching the decision, including the ability of the various alternatives to satisfy the project objectives and a statement disclosing whether all practicable means to avoid or minimize environmental harm from the alternative selected have been adopted (including a description of the monitoring and enforcement program), and if not, why they were not (CEQ Regulations Section 1505.2).

4.3 PUBLIC INVOLVEMENT (PI)

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PUBLIC PARTICIPATION PROCESS

PI-1. *Clearly Defining the Public's Role in NEPA and NHPA*

San Francisco Architectural Heritage and others suggest that the public would be better served if the Section 106 process, the NEPA review procedures, and the public opportunities afforded by each were clearly described. They ask that the Trust demonstrate by example when and how public participation would be accommodated.

Response PI-1 – NEPA directs that a federal agency examine the environmental impacts of any major action it undertakes. Public involvement is one of the most important parts of the NEPA process (40 CFR Section 1506.6). Its importance is embedded in the Trust's NEPA regulations, which state "The Trust will make public involvement an essential part of its environmental review process" (36 CFR Section 1010.12).

The Trust's environmental review process starts with a preliminary screening of all Trust projects to determine NEPA's applicability to a proposed action. If an action is not categorically excluded or otherwise exempt, then the Trust prepares a study known as an environmental assessment (EA) to evaluate whether the proposed action is likely to cause significant environmental effects. This determination allows the Trust to proceed to the next phase of project review, either preparing an environmental impact statement (EIS) or a finding of no significant impact (FONSI). In appropriate cases, like this PTMP planning process, the Trust bypasses the preparation of an EA and immediately prepares an EIS.

At a minimum, the Trust will involve the public as set forth in both the CEQ and Trust NEPA regulations (40 C.F.R Section 1506.6 and 36 CFR Section 1010.12). The process in NEPA and its regulations set out numerous opportunities for persons or organizations to submit comments on proposed federal actions, opportunities that are designed to provide an interactive process and allow the public to communicate with the Trust and influence the outcome of Trust actions.

Under the CEQ NEPA regulations, for example, the Trust must provide a public scoping process (40 CFR Section 1501.7), provide public notice of the availability of a Draft EIS to interested persons and agencies (40 CFR Section 1506.6(a), (b)), provide notice to those who have requested it for an individual action (40 CFR Section 1506.6(b)(2)), provide public notice mechanisms for actions of primarily local concern (40 CFR Section 1506.6(b)(3)), and may provide a public hearing on a Draft EIS (40 CFR Section 1506.6(c)). The Trust regulations go beyond what is required of federal agencies generally and contain a commitment to hold public scoping meetings and public workshops on projects subject to an EIS (36 CFR Section 1010.12). The regulations also allow for a public scoping meeting prior to the determination of whether an

EIS is required (36 CFR Section 1010.5), and the Trust must give public notice once it has made the determination to prepare an EA (36 CFR Section 1010.11(a)). As noted in the Trust NEPA regulations, "[p]ublic notice of anticipated Trust actions that may have a significant environmental impact, opportunities for involvement, and availability of environmental documents will be provided through announcements in the Trust's monthly newsletter, postings on its website (www.presidiotrust.gov), placement of public notices in newspapers, direct mailings, and other means appropriate for involving the public in a meaningful way."

In practice, the Trust goes beyond the minimum regulatory requirements for public involvement. Many other public involvement opportunities both formal and informal supplement NEPA's requirements and the additional requirements in Section 1010.12 of the Trust's NEPA regulations. For example, consistent with the Trust Act and its Public Outreach Policy (Board Resolutions 97-3 and 98-16) for sharing information with the public and seeking public comment, the Trust Board holds public Board meetings to provide information and to listen to public opinion and concerns. Trust staff have coordinated innumerable workshops and public input sessions on diverse topics; the Trust publishes a monthly newsletter with a mailing list of about 12,000 interested parties and prepares fliers or notices on issues of special interest. Trust staff initiate and participate in regular discussions with neighborhood, community, environmental and business organizations. The Trust maintains an informative website, and an extensive public library of relevant documents, including NEPA environmental documents.

In addition to the Trust's compliance with NEPA's public review process, compliance with the NHPA is central to any project that may have an effect on the National Historic Landmark District. Section 106 of the NHPA requires federal agencies to take into account the effects of their actions on historic properties and to consult with the an independent reviewing agency, the Advisory Council for Historic Preservation (ACHP) regarding the agencies' proposed actions. The revised regulations of the ACHP (Title 36 of the Code of Federal Regulations at Part 800) provide the methodology for assessing these effects on historic resources and detail the requirements of the consultation process. These regulations further encourage federal agencies to "consider their section 106 responsibilities as early as possible in the NEPA process and plan their public participation, analysis, and review in such a way that they can meet the purposes of both statutes (NHPA and NEPA) in a timely and efficient manner" (36 CFR Section 800.0).

When a project is complex and is expected to continue over time, the regulations allow development of a Programmatic Agreement (PA) that governs ongoing and future activities undertaken as part of the project or program it addresses. The Trust has finalized a PA (EIS Appendix D), and its implementation satisfies the agency's obligations under Sections 106 and 110(f) of the NHPA.

The Trust will target its outreach to those interested in historic preservation to keep them informed regarding Trust activities and ensure their participation and input at the earliest stages of planning regarding those projects that may adversely affect a historic feature. Elements of this outreach will include:

1. Pre-scoping and scoping notices for Trust projects that would be subject to EAs or EISs;

2. Making documents related to the projects described in such scoping notices available for review in the Presidio Trust library;

3. Providing agendas (via email) of regularly scheduled NEPA/NHPA review meetings that describe Trust projects that are being considered for a Categorical Exclusion under NEPA; and

4. Providing summary results of the NEPA/NHPA review meetings (via email) upon request.

For more discussion on public involvement in planning and implementation decisions, see Chapter Four, Figure 4.3 of the Final Plan.

PI-2. ***Clearly Defining the Public's Role in Trust's Future Decisions and Park Management***

The NRDC letter states that the PTMP lacks clarity about the role of the public in future decision-making. The commentors note that because the Presidio is a park, the Trust is obligated to involve the public in its

management. ("When multiple planning options are identified as preferences, the Plan is silent on the process to be used to make choices between these options. A process that allows the public meaningful review and comment on these choices should be provided.")

Response PI-2 – The Trust is committed to public participation during Plan implementation. NEPA's procedures provide the foundation that the Trust will use to make choices between planning options. While NEPA does not require the Trust to involve the public in every management decision, the Trust agrees that NEPA provides a required baseline for involving the public in decisions that may have a significant impact on the Presidio.

In response to these and other comments, the Trust has provided greater specificity in the Plan about the public's role in the Trust's future decisions regarding Plan Implementation. Figure 4.3 (Public Involvement in Implementation Decisions) has been added to the Final Plan and outlines anticipated public participation during Plan implementation for different Trust projects and activities. Figure 4.3 indicates that there will be opportunities for meaningful public input, often including public review and comment, before important Plan implementation decisions are made and that the actual process will vary depending upon the magnitude and potential effects of the proposal. The public can expect to be involved generally as outlined in Chapter Four's section on Public Involvement and Partnerships and in Figure 4.3, consistent with the NEPA and NHPA public involvement standards and further voluntary public outreach described above in Response PI-1.

PUBLIC PARTICIPATION ON PTMP

PI-3. ***Effect of Specificity on Public's Ability to Comment***

The Trust notes with appreciation the comment made by NRDC, joined by NPCA, the San Francisco League of Conservation Voters, and the Wilderness Society:

> "At the outset, we wish to express our appreciation to the [Trust] Board for its willingness to take into account the views of the public so far in the PTIP process as evidenced most recently by the extension of the comment period. We recognize that a great deal of work has gone into the process to date. What is more, we acknowledge specifically the willingness of Trust staff to meet with us throughout the PTIP process to hear our concerns and their positive responses to many of our information requests. Further, we acknowledge that a number of the requests we made during the scoping stage, including our request that background studies being used in the PTIP process be made available to the public, [footnote omitted] were responded to positively."

NRDC, the Sierra Club and other commentors go on to express concern that the lack of specifics in the PTMP has prevented the public from participating in any meaningful way. They argue informed public participation is not possible without a clear statement of what the Trust seeks to accomplish and why, along with an equally clear description of how it intends to achieve its stated purposes. One commentor laments "It's hard to comment on the plan unless something specific is outlined." This sentiment is echoed by another: "Trust representatives have . . . solicited from the participants specific ideas, specific criticisms, specific evaluations. As a layperson, it is difficult for me to see how such specific commentary can be rendered, when there is little specific to respond to."

Response PI-3 – The comment from several members of the public that they have been prevented from meaningful participation due to a lack of specificity in the Plan reflects a lack of recognition of the Trust's programmatic approach under the Plan. A programmatic approach is an appropriate and widely employed approach to planning. Under NEPA, a programmatic plan and EIS is typically used for a broad geographic area and emphasizes policy-level alternatives, cumulative impacts, and program-level mitigation measures. The most commonly known type of programmatic plan is a city's general plan, which establishes a broad policy and land use framework within which more specific decisions will be made. In the Trust's judgment, the programmatic approach taken under the PTMP is better suited to the Trust's long-term management of the Presidio than the site-specific type plan many commentors would have preferred. The PTMP looks comprehensively at all of Area B and establishes a broad land use and policy framework.

Electing to prepare a programmatic plan and EIS has in no way prevented meaningful or informed public participation. On the contrary, commentors ably provided thousands of meaningful and thoughtful comments on the full range of policy and land use issues, and many of these comments have led the Trust to change and improve the Plan and EIS. As an example, in response to the call for a more specific and clear statement of what the Plan seeks to accomplish, the Trust now more clearly states in the Plan its overall land use goals of achieving approximately 75 percent open space and 25 percent built space. The Plan further articulates that within the built environment, approximately one-third will be for public-serving uses, another third will provide residences largely to Presidio-based employees, and the last third will be for office space for a diverse group of tenants from the public, private, and non-profit sectors.

Two commentors who claimed that informed public participation was not possible offered collectively more than 90 pages of comments, not including appendices and attachments to their comment letters. Indeed, had the lack of specifics prevented or caused real difficulty for commentors, the Trust would not have received 3,090 comment letters and communications from 2,989 individuals, 91 organizations, and 10 agencies, in 49 of the 50 states (and from foreign countries as well).

The programmatic nature of the Plan and EIS, did not deter many commentors from making very specific comments about specific sites and specific uses of specific buildings. Indeed, the Sierra Club, which claimed that "the public has no way of participating in any meaningful way," offered comments that included a complete building-specific planning proposal for Area B, which the Trust used to develop the conceptual variant to the Draft Plan that has been analyzed as part of the Final EIS. Thus, the Trust will be using even these specific comments to inform its decision-making about the general land uses and policies of the Plan.

PI-4. ***Oral Comment During Public Meetings***

One individual who spoke at all of the public meetings (and submitted multiple written comment letters) complains that the two minutes allotted to each speaker at the PTMP public hearings precluded meaningful dialogue, and requests that the Trust allow more ample time for speakers in all future public hearings.

Response PI-4 – Throughout the PTMP planning process, the Trust has offered the public many ways to participate. The history and scope of public involvement is provided in Section 5.1 of the Final EIS. In order to make public input as easy and convenient as possible, the Trust invited comment in a variety of forms – letters, telefax, email, telephone, guided questions, workbook responses, oral comment at public hearings, and at one public meeting even handwritten notes on "Post-it" paper that could be appended to the Trust's graphic displays. The Trust has never placed any limitations on the nature and scope of written public comment and input, other than imposing specified and publicized comment deadlines.

At every PTMP public workshop and at every PTMP public hearing, the Trust provided an opportunity for interested members of the public to make oral comments. Because Trust public meetings tend to be well-attended, the Trust imposed a reasonable time constraint on public speakers in order to give all who wished to make oral comments a chance to speak. To the extent a commentor may have felt shortchanged by this reasonable time limit, the Trust was assiduous in explaining that further comment would be welcomed through other means. Nearly all of those who spoke publicly at Trust workshops and hearings also submitted comments in some other form, often reiterating and expanding on what was said publicly at the meeting.

To the extent public speakers wished for meaningful dialogue, Trust representatives at workshops and hearings regularly answered those questions that could be answered (i.e., generally, the Trust answered comments or questions seeking factual information and clarification about Trust proposals and activities). Response at public hearings to public comment on ultimate planning decisions would have been improper under the NEPA process as the statute requires an agency to consider all comments prior to making a final decision. The Trust therefore could not respond at public hearings and instead took oral comments under advisement as part of the Trust's decision-making process. As required by NEPA, the Trust is responding to both oral and written comments that it received regarding the Draft Plan and EIS in this Final EIS.

PI-5. Public Perceptions

One individual expresses dismay about Trust Board members "inappropriate remarks" to the local press about public comments received, and cites one Board member as saying that most public comments have been "vague" while another Board member attributed public concerns about PTMP to "NIMBYism." She is concerned about the mixed message to the public. ("Make specific comments, and you are labeled a NIMBY. Make less specific comments, and your comments are dismissed as vague.") Another commentor asserts that the public has proved that the Presidio can be self-sufficient by 2004, and accuses the Trust of wrongfully and intentionally providing "false information to disinform the public."

Response PI-5 – The Trust cannot control the accuracy with which the media reports statements that may be made by Trust representatives, and regrets any reported comments, whether accurate or not, that may have caused offense.

The Trust welcomes comments from all persons. The Trust has not dismissed any comments as "vague" nor prejudged comments based on the nature of the comment or the identity of the commentor. At times, the Trust has encouraged commentors to offer comments on the Plan and EIS that are as specific as possible so that the Trust can consider changes to a specific area of concern rather than having to interpret a general opinion.

At no time in the PTMP process has the Trust undertaken to misinform the public. Some members of the public, in their passion to protect the Presidio, have put their own information or interpretation forth that has been presented as true and accepted by others. The commentor has misinterpreted some of this outside information to conclude that the EIS alternatives and analysis presented by the Trust are intentionally false. The Trust encourages this commentor and the public generally to consider the whole record, including these responses to comments, before assigning shortcomings to the Trust's information.

EXPANSION OF PUBLIC OUTREACH

PI-6. ***Building Trust and Identifying/Reaching the Affected Public***

The Trust received various comments about the need to "build better trust" with the public. Most commentors recommend that the Trust should develop broad support for the planning process and should encourage the public to participate in the planning decisions that will follow. ("As written, the PTIP creates fear, uncertainty, and suspicion that will develop into an adversarial process for every future decision" and "the Trust has some major work to do to improve the PTIP prior to any acceptance by the public.") One commentor states that a key challenge for the Trust is to build trust with its surrounding neighbors. Another feels that the Trust should encourage the involvement and support of local businesses in the planning process. Yet another commentor's personal observation is that the commentary on the Plan originates predominately from immediate neighbors (the closest having the keenest interest), and a broader perspective of the Presidio as a national park could be achieved with more outreach to the City and Bay Area at large.

Response PI-6 – The Trust understands the importance of building relationships with the many Presidio stakeholders. The best way to "build better trust" is to provide opportunities for the constructive exchange of information. The Trust believes that the NEPA process and the public's key role in that process provides a foundation on which the Trust can and must build. In addition, the Trust has and will continue to pursue and expand regular outreach to a wide variety of interest groups and stakeholders. The Trust regularly meets and interacts with neighborhood associations, natural resource conservation organizations, historic preservation groups, and San Francisco planning and civic organizations. That said, the number of interest groups is large and diverse, and the Trust's plans and policy choices will inevitably not please or fully satisfy every group or individual. The Trust's goal, however, is to provide clear information so that the public understands the basis for the Trust's choices.

PI-7. ***Establishing a Formal Relationship with the City***

The CCSF Planning Department seeks a formally recognized relationship with the Trust to minimize policy differences regarding future development,

particularly for park issues that may have an effect on bordering neighborhoods, such as land use, transportation, housing, public services and utilities, and fiscal impacts. Other commentors raise the issue of the importance of a partnership between the Trust and the City. San Francisco Planning and Urban Research Association suggests that the Trust create an "implementation team" composed of Trust, City and community members. A Presidio advocacy group asks the Trust to specify whether development would be managed differently than activities within the City.

Response PI-7 – The Trust acknowledges the importance of good working relationships with other governments and agencies, such as the City and County of San Francisco, but a formal legal relationship is unwarranted. The Presidio has always been a federal enclave, under the Army, the NPS, and now the Trust. As a federal enclave, it is exempt from the administrative jurisdiction of any other level of government. The Trust Act itself defines certain legal limits with respect to the City and County of San Francisco: "The Trust and all properties administered by the Trust shall be exempt from all taxes and special assessments of every kind by the state of California, and its political subdivisions, including the city and county of San Francisco."

Nevertheless, because the park adjoins the City, the Trust shares the City's interest in the effects of the Presidio on the larger urban environment. In some areas there is a need for closer coordination than in others. The City does not provide many of the necessary public services within the Presidio, such as police and fire service. In other areas, such as sewer service and some potable water supply, the Trust pays the City for any service it provides. The housing policies of the PTMP have the benefit of minimizing the effect of Presidio activities on the City's limited housing supply. Furthermore, the Trust coordinates regularly with the City on transportation issues, and is working to strengthen coordination in this important area. The Trust will continue to improve and maintain effective relations with the City and to further an understanding of mutual benefits.

With respect to whether development would be managed differently than activities within the City, the Trust has a different set of statutory regulations that guide rehabilitation of existing buildings and new construction. The Trust follows all applicable building and life/safety codes, laws and Trust policies, including those reflected in the PTMP. Nevertheless, as discussed above, the Trust will coordinate with the City on key development issues that would affect City government or residents.

PI-8. ***Projects Proceeding Directly from PTMP***

A number of commentors request that the Trust should state which reasonably foreseeable projects would proceed directly from the PTMP. Commentors are concerned with the statement in the EIS that some projects consistent with the PTMP, such as long-term leases, could proceed immediately without further environmental review, and seek clarification as to what types of projects have been adequately assessed and could be implemented. Several commentors, including the NPS and the Neighborhood Association for Presidio Planning (NAPP), request a list and rough schedule of expected future planning to assess the level of public participation required. Another individual questions the Trust's commitment to future planning due to the range of actions that would not require public review.

Response PI-8 – The PTMP is a programmatic management plan for Area B. Since implementation of the Plan is affected by market forces, it is not possible to state with certainty at this stage of planning which projects will proceed directly from the PTMP. The overall implementation strategy for the Plan is to carry out projects that advance the Trust's preservation and financial goals. In undertaking many of these projects, the Trust will engage the public in more site-specific decision-making for the park's future. The Trust understands that this programmatic approach followed by unspecified future planning and public process does not satisfy some members of the public. Nevertheless, the Trust can provide a general understanding of its approach and relevant examples of the type of project that may proceed directly from the PTMP without more detailed planning or formal public process. The critical factor is whether the environmental impacts of such projects were evaluated in this (or another) NEPA document.

In general, leasing/tenant selection decisions that involve little to no physical change to the Presidio's resources and landscape and that are consistent with the land uses identified under the PTMP are the type of projects likely to proceed from the PTMP without further formal public process. This is because the potential environmental impacts of such projects will have already been

analyzed in the EIS. For example, it is likely that leasing of historic structures for uses consistent with the Plan, and the associated rehabilitation of such structures in accordance with historic preservation standards, will proceed directly from the PTMP. No lease, however, will be proposed without public notice either through the lease offering itself or through other general public notice. Other projects that would have the potential to bring about significant physical changes to Presidio resources or landscapes are likely to be subject to further planning and public input because the specific impacts of such projects may not have been analyzed in the EIS, thereby necessitating supplemental environmental analysis.

In an effort to address NPS' and NAPP's request to "assess the level of public participation" that is more likely than not to attend specific types of Trust activities and to provide these commentors and the public with a better idea of the general nature of future decision-making processes, the Trust added Figure 4.3, Public Involvement in Implementation Decisions to the Final Plan, and its accompanying text. This figure describes briefly the range of actions anticipated in the future and the nature of further planning. and public involvement.

In response to the request to provide a list and rough schedule of expected future planning, the Trust added Figure 4.2A, Near-Term Implementation Activities and Figure 4.2B, Long-Term Implementation: Generalized Timeline and accompanying text (pages 146-150) to the Final Plan. Figure 4.2A identifies some near-term planning and projects anticipated following adoption of the Final Plan (e.g., Main Post Landscape, Parking, and Circulation Changes; West Crissy Field Feasibility Study; Recycled Water and Water Conservation; etc.). Because the timing of individual improvements and leasing, even in the near term, depends to a large extent on market conditions and other uncertain factors, the Trust did not consider greater specificity or a more precise schedule of possible planning activities as being practical. The Trust will forecast more specific planning and project priorities through its annual budget and work programming process and multiple-year strategic planning. Once final, these documents will be made public.

The precise scope and timing of long-term planning activities are even more difficult to predict. Nevertheless, Figure 4.2B gives commentors an overview of long-term implementation actions (e.g., demolish one-third of Wherry Housing for habitat restoration, invest in subdividing and converting existing buildings to replace lost housing units, etc.). The identified actions in Figure 4.2B are by no means comprehensive of all Trust activities in the long-term over time, the Trust will propose more specific planning activities and projects (e.g., site improvements, landscape changes, building rehabilitation and reuse, area plans and topical plans, possible replacement construction), most of which are likely to require further public involvement, as described in Figure 4.3.

PI-9. ***Committing to Future Plans with Greater Specificity***

Many commentors ask the Trust to engage in additional future planning and environmental analysis. In general, these commentors would like the Trust to specify the future planning process, including future plans, actions, and decisions to be made. According to the GGNRA Citizens' Advisory Commission, future plans should "determine where and how much space should be devoted to conference and lodging, museum and cultural/education activities, what buildings are suitable for conversion to residential use and which residential buildings might be subdivided into additional dwelling units." The Sierra Club and others, including the GGNRA Citizens' Advisory Commission and Fort Point and Presidio Historical Association, request that the Trust complete park-wide "issue-oriented" plans (such as housing, lodging, conference, cultural/educational, and parking) prior to any implementation actions under the Final Plan or before any demolition or new construction is proposed, and commit to public hearings on these plans before any building is put out for bid or any lease signed. The Sierra Club states "Without a park-wide plan for each use, district plan evaluation is meaningless."

In addition to issue-oriented plans, many commentors suggest that site-specific and district-level plans be developed. These plans would specify which buildings would be removed or retained, the amount, location and size of replacement construction, the uses or alternative use for each of the buildings and the treatment of landscaped open space in the area. District

planning would also include specific requirements and methodologies for public input, review and comment as well as an established dialogue to facilitate response to public comment. They recommend that district plans be completed prior to committing to long-term leases throughout the district. They also request that the Trust not make final decisions on the maximum allowable density of an area before detailed studies as part of the individual district plans are conducted.

Response PI-9 – PTMP sets out the Presidio-wide conceptual plan for land uses, including each of the land-use topics about which some commentors expressed particular concern. In response to public comments, the Trust has made the Final Plan more specific in a number of ways – e.g., housing proposals have been made more specific, cultural space has been disaggregated from educational space, and preferences have been identified for cultural use of specific buildings. The Trust has also added greater specificity to the Final Plan regarding large-scale demolition proposals – 463 units in Wherry Housing, more than 60 units in Tennessee Hollow, and a few units in East and West Washington – for habitat restoration and additional open space. The Trust will undertake more specific planning that will involve the public, as it progresses into implementation of the PTMP. Some of this planning will take the form of an area-specific proposal within a planning district, some may take the form of a district-level proposal, and some may be building-specific projects. For example, the Trust intends to develop and analyze alternatives for Main Post landscape, circulation, and parking following the adoption of the Final Plan. This planning proposal, which combines the issue-specific approach with an area-level plan, will be fully vetted through public review and input. Other projects within a district that may receive the Trust's attention in the near term include West Letterman buildings and streetscapes and West Crissy Field (Area B) building reuse and rehabilitation. Refer to Figure 4.2A. More specific future proposals will be consistent with the framework and outer bounds or "envelopes" defined by PTMP. If future proposals depart from or are inconsistent with the PTMP land-use framework, they will be subject to supplemental environmental analysis and public input. The nature of public participation likely to accompany a variety of the Trust's possible future activities is summarized in Figure 4.3, Public Involvement in Implementation Decisions in the Final Plan.

Comments suggesting that the Trust engage in an almost endless process of follow-on planning after PTMP (e.g., separate building-specific park-wide plans for housing, lodging, conference, cultural/educational uses and more), while deferring leasing and before taking any implementation actions, are impractical. Given the Trust's need to preserve rapidly deteriorating historic structures and to achieve financial self-sufficiency by 2013, a Presidio-wide building-specific plan for each land-use topic (e.g., housing, lodging, conference, educational, cultural uses) is untenable. Such an approach would be too inflexible to allow the Trust to respond to changing market conditions and manage uncertainties inherent in leasing and financing of the rehabilitation of Presidio buildings.

The Trust understands that for some commentors, the call for building-specific district-level and issue-oriented plans grows out of the desire for more certainty and the concern that PTMP does not specify, in some instances, exactly which buildings would be removed or retained or the exact location and size of any replacement construction. Beneath this concern is the fear that the Trust will act – for example, will demolish existing buildings or construct replacement structures – without further opportunity for the public to influence the Trust's decisions. This will not occur. Figure 4.3, Public Involvement in Implementation Decisions, summarizes the opportunities for the public to participate in the decision-making process. Activities such as the proposed demolition of an historic structure and proposals for free-standing new construction or a significant addition to an existing structure would be publicly announced and would involve review and public process under NEPA and the NHPA.

The Trust must reserve the ability to undertake implementation of the PTMP in a variety of ways as described above, each with an appropriate level of public process. Refer to Figure 4.3 and Responses PI-1 and PI-10.

PI-10. ***Committing to Future Public Input and Environmental Review***

In addition to wanting detailed future planning for a wide array of Trust actions, many commentors want assurance of full public participation at every stage in the Trust's future planning and decision-making. To do so, said the NRDC letter, would help assure the utility of the PTMP and allow the public to participate in this planning process in a meaningful way. They, and others

such as NAPP and the Fort Point and Presidio Historical Association, request that the Trust establish a public process by which the public can have input into a wide range of Trust activities (e.g., leasing, rehabilitation of existing buildings, use of facilities, transportation, significant infrastructure improvements and demolition). One individual would like to see processes established "through which the public and key organizations and volunteer communities will be able to advise on tenant selection, program, and district planning in the future."

The NPS and others also seek further clarification to establish when public environmental review would be triggered by Trust actions. Some commentors ask the Trust to be specific about what projects and programs will require additional review. The Sierra Club comments that the Trust's commitment to future plans is weak because it provides for a range of actions that will not require public review. The Sierra Club claims that the Trust has excluded from review over 1 million square feet of nonresidential space that currently remains unleased and that "the process for public involvement in Trust major decisions affecting use of existing buildings, demolition and new construction is not assured." The NPS comments that it appears opportunities for public involvement would be curtailed in the future even for important demolition and new construction decisions. Historic preservation groups such as the San Francisco Architectural Heritage and other organizations want the opportunity to comment on site-specific demolition and new construction at the time proposals are brought forward.

The Fort Point and Presidio Historical Association and the Planning Association for the Richmond (PAR) urge that the Trust's budgeting process be made a public process. The GGNRA Citizens' Advisory Commission recommends that the Trust should commit to a one-, two- and five-year budget that provides an opportunity for public comment. The Commission further suggests that each year before the Trust finalizes its report to Congress that sets out its vision and work program for the coming year, it should provide an opportunity for public comment.

Response PI-10 – The perception that a wide range of Trust actions will not require public review is simply inaccurate. As illustrated in the Final Plan's Figure 4.3, Public Involvement in Implementation Decisions, the vast preponderance of Trust actions will proceed with some level of public scrutiny. The requirements of NEPA will determine the specific process for public input, depending upon the potential effects of the proposed action. This means that district plans and site-specific project proposals that have the potential to create significant environmental impacts (and that have not been analyzed in this or another NEPA document) will be subject to NEPA and its public process. While it is impossible to know now the precise timing or nature of environmental review (e.g., environmental impact statement, environmental assessment) that will be appropriate or required in general projects that have the potential for causing significant environmental impacts that have not been previously analyzed in the EIS or other environmental document (e.g. the GMPA EIS), will trigger further public process under NEPA.

NEPA provides the clear threshold and standards for when environmental review is triggered and the foundation for ongoing public involvement in the Trust's decision-making process. Refer to Response PI-1, for a description of how the public can use NEPA to utilize opportunities for public input to the public's best advantage. Response PI-1 also sets out ways in which the Trust will go beyond the public process requirements of NEPA to ensure that the public has meaningful opportunities to participate in planning and decision-making.

Contrary to some assertions, opportunities for future public input – especially on decisions such as replacement construction, which was cited by NPS as a particular concern – will not be curtailed. As shown in Figure 4.3 of the Final Plan, projects involving building demolition and proposed new construction will involve extensive public process. Furthermore, a Programmatic Agreement crafted under Section 106 of the NHPA has been signed by the Trust, NPS, ACHP and the California State Historic Preservation Office. The execution of this Programmatic Agreement signifies that each of the signing agencies endorses the protective process that the Agreement specifies will precede decisions that could potentially cause adverse effects to the historic landmark district. That process provides individuals and groups concerned about historic preservation with the opportunity to comment on site-specific demolition and new construction at the time the proposals are brought

forward. A more detailed description of the nature of public process around proposals like these is provided in Response PI-1.

Those commentors who assert that the Trust has excluded from public review the reuse of over 1 million square feet of non-residential building space fail to recognize that the land use decisions for building space at the Presidio have been proposed, analyzed, and vetted through the PTMP (and before this, the Letterman) public process. These commentors desire assurance that the Trust will provide the public with the opportunity to comment on virtually all of the Trust's future decisions. Future leasing proposals must be consistent with the Final Plan's land use framework. If not, they will be subject to further environmental review and public input. Certain implementation decisions, however, such as tenant selection consistent with the Final Plan and the rehabilitation of historic structures consistent with the Secretary of Interior's standards, are within the management discretion of the Board, and, will not be generally subject to further public comment.

The Trust similarly regards decisions about work priority and allocation of resources to be within its management discretion. Indeed, NEPA does not require that a government entity analyze or review its budget for potential environmental effects (40 CFR Section 1508.17; Andrus v. Sierra Club, 442 U.S. 347 (1979)). The Trust is, however, weighing the GGNRA Citizens' Advisory Commission suggestion to provide public notice of its work program for the coming year prior to finalizing it in the annual report to Congress. The Trust has made no policy decision on whether or how to allow public review of the Trust's proposed annual work priorities; no decision is required before finalizing the PTMP.

PI-11. Committing to Working with Interest Groups

A number of commentors ask that the Trust continue working with the Sierra Club and other groups to arrive at a community consensus on a preferred alternative for the Presidio. ("Due to the great diversity of opinions voiced by the many non-governmental organizations and political groups in the area some means of quantifying the citywide consensus should be developed.") Commentors also request that the Trust should continue to work with the GGNRA Citizens' Advisory Commission on PTMP projects that involve Area A.

Response PI-11 – The Trust acknowledges the importance of public dialogue, and the role of public input in future decision-making is clearly articulated in Chapter Four of the Final Plan. The role of agency consultation and participation by the GGNRA Citizens' Advisory Commission is also addressed. The suggestion that "consensus" should be the goal of the planning process appears to be at odds with the "diversity of opinions" also cited. As mentioned elsewhere in the Response to Comments (see Section 3.1 above), 83 percent of the comments on the Presidio's future came from outside of San Francisco. Because of this diversity, and because of its obligations under the Trust Act, consensus cannot be the Trust's primary objective. Instead, Chapter One of the Plan, which includes incorporation of public input, articulates the goals of the planning process.

4.4 VISION (VI)

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VI-1. *Articulate a Clear Vision*

Several commentors, including the NPS and GGNRA Citizens' Advisory Commission, request that the Trust articulate a clear vision for the Presidio or overall concept of the Trust's purpose. They maintain that the vision statement of the PTIP would benefit from a clear restatement of goals, both for the Trust, and for the planning document. The NPS offers that the Trust Act in Sections 101(5) and (7) sets two equal and essential agency goals: (1) to protect the Presidio's resources from development; and (2) to minimize cost to the U.S. Treasury. They recommend that these two goals should provide the basis for a more explicit vision. The NPS acknowledges the Trust's financial mandate (to be financially sustainable by 2013), but believes that the fundamental course for the Presidio should remain focused on the values which the NPS finds essential to the Presidio. ("The Presidio's unique park character – its significant cultural, natural, scenic and recreational resources – must be the cornerstone that guides our vision.") The NPS urges a stronger commitment to the national park character of the Presidio and the preservation of its cultural and natural resources. ("The value of the Presidio to future generations of this nation is that it is, no matter the management structure, a national park."). They ask the Trust to "stay on a course that protects the integrity of the National Historic Landmark District, restores valuable natural resources, and preserves the visitor experience originally planned for this park." The GGNRA Citizens' Advisory Commission "hopes that the Presidio Trust will affirm its long term commitment to keep the Presidio as a great National Park." The University of San Francisco believes that the "core spirit" of the plan must "flow from a fundamental commitment to meaningful educational, cultural and non-profit activity together with a suitable global and local community vision." An individual notes that the scale and complexity of the Presidio's resources have created special demands which Congress has met by creating a unique management structure with unique performance standards and requirements. He feels the Trust is correct in saying that its first priority is "to protect and preserve the park's unique resources for the future," and wishes to add "enhance" to that sentence. Others are more scornful and "find little sense of vision or cohesiveness" in the PTIP. One individual criticizes the plan as "a discordant stew of planning concepts with no unifying theme" that would "reduce the Presidio to an odd hybrid: one part redevelopment project, one part corporate business park, and one part grandiose 'cultural destination' or 'center for arts and culture.'" Another individual remarks that the plan "reads like a city development plan for a dense live/work area populated by financially sound tenants" that "lacks a sense of grandeur, higher purpose, vision."

Response VI-1 – The NPS begins its comments by saying that "we believe that the fundamental course for the Presidio, as adopted in the GMPA should remain the same. The Presidio's unique park character – its significant cultural, natural, scenic, and recreational resources – must be the cornerstone that guides our vision. We urge the Presidio Trust to put this vision first." The Trust agrees. The Final Plan includes a clearer statement of the overall concept of the Trust's purpose and vision than was presented in the Draft Plan. As suggested by the NPS, the revised statement of the Trust's vision begins with an explanation of two equal and essential Trust goals that derive from mandates of the Trust Act: to protect the Presidio's diversity of resources and to generate revenues sufficient to do so without need for annual federal funding. From there, the Trust has restated its commitment to make the cornerstone of its vision the national park character of the Presidio and the preservation, protection, and enhancement of its cultural and natural resources. While these concepts have in the Trust's view been carried over from the Draft Plan's vision statement, some comments on the Draft Plan illustrated that these concepts were not clearly articulated. The Trust believes the restatement of the vision in the Final Plan is a clear affirmation of these

important priorities. The Trust vision statement acknowledges that these essential priorities must be met by first building a sufficient financial base to meet the congressionally established financial condition of self-sufficiency for the long-term. In sum, the Trust's revised vision statement affirms the Trust's commitment to keep the Presidio as a great national park.

Certain comments revealed that an aspect of the vision statement that confounds the public is the extent to which the Trust's management of the Presidio is driven by a "unifying theme," a "sense of . . . higher purpose," or a "suitable global or local community vision." See Response VI-7 for discussion of this aspect of public comments.

Goals of the planning process are included in Section 1.3 of the EIS, while goals of the Plan are articulated throughout the Final Plan as principles, guidelines, and statements of intent. All of the Plan goals stem from the overarching mission of the Trust to preserve and enhance the Presidio's cultural, natural, scenic, and recreational resources for public use and enjoyment. This is the unifying theme of the document, which calls for increased open space and decreased building space, and emphasizes public uses and programs. Financially sound tenants are prerequisites for achieving Plan goals, but do not make the Plan a "development plan."

VI-2. *De-Emphasize Financial Self-Sufficiency*

One commentor asserts that the need for financial self-sufficiency is merely one of several "rather mundane" constraints, and that it would be a "great mistake" to be viewed as part of the Trust's higher mission. ("This seems analogous to an individual declaring that 'making ends meet' is half the purpose for living, or the NPS declaring that 'partially relying on federal appropriations' is half its mission.") The commentor asks whether Congress "hasn't charged the Trust with a higher purpose...?" Several individuals submitting a petition believe that the mission statement in the PTIP has goals that are much more ambitious than the mission statement of the Trust and go beyond the Presidio as a national park. ("We believe the mission is circumscribed and contextual, while the PTIP describes a much broader charter, necessitating too high a level of commercial activity to support it.") Another individual asks why the GMPA should be replaced with the Trust's "vision of commercial over-development, since the GMPA meets the goal of financial self-sufficiency?" Another individual questions whether real estate profits should fund the visionary work of solving major world problems and whether the intent of the legislation that created the Trust makes business sense.

Response VI-2 – Congress charged the Trust with managing property within its jurisdiction in accordance with the purposes of the GGNRA Act and the general objectives of the GMPA. From this charge, the Trust derives its mission of preserving and enhancing the Presidio's cultural, natural, scenic, and recreational resources for public use. In establishing the Trust, Congress created a financial condition of self-sufficiency – the park would have to be managed in a way that would pay for itself without annual federal appropriations after 2013. The Trust agrees with commentors that the Trust Act's requirement of financial self-sufficiency should be viewed as a constraint on or a precondition of its mission. It nevertheless is an essential condition, which if not met, has irreparable consequences under the Law: the loss of the Presidio as federal parkland, its removal from the boundaries of the GGNRA, and its sale by the General Services Administration. These consequences are not a product of speculation – they would be a direct result of the Trust's failure to meet the explicit self-sufficiency requirement of the Trust Act, established by Congress. The Trust therefore considers financial success to be vitally important; it influences the factors to be considered, the way in which opportunities are viewed, and the approach to the Trust's management and decision-making. With financial success as a condition, decisions and commitments by the Trust about the Presidio can only be made after considering the financial consequences and effect of any action on the overall financial viability of Area B of the Presidio as whole.

The Trust disagrees with those commentors who suggest the Trust has broadened its congressional mission and with commentors who feel the Trust's mission should be broadened to include the "visionary work" of solving world problems. The mission of the Trust is fundamentally the preservation and protection of the Presidio and its resources as a park for public use in perpetuity. Congress recognized, as does the Trust, that this mission alone will be extremely costly and in itself a challenge. The basic tenet of the Trust Act is that leasing revenues from Presidio building space must fund the preservation of the Presidio.

The Trust further disagrees with those commentors who suggest the Trust's vision is one of "commercial over-development." The Final Plan makes plain that the essential park-like character of the Presidio will not change. Instead, open space will increase substantially over time, and the amount of building space will decrease. Any new construction will occur in already developed areas, and will simply replace some of the building space removed elsewhere. Physical changes will be in keeping with the Presidio's designation as a National Historic Landmark, a diversity of tenants will be accommodated, and natural resource and sustainability goals will be pursued.

VI-3. ***Recognize the Presidio as a Neighborhood vs. National Park***

One group of commentors admonishes that "the park is both a neighborhood park and a national park" and therefore "the Trust needs to openly recognize and address relevant neighborhood issues." An individual is "troubled by the confusion" in the opening chapter of the PTIP caused by stating that the Presidio is a national park located in a heavily urban environment, and doubts whether "folks from around the country are going to be commenting on this document." A local business in its comments took the opposite position: "The Presidio is a national park, not a neighborhood park."

Response VI-3 – The Presidio lies within the GGNRA, a national recreation area, and at 77,000 acres the largest urban park in the nation. Like the greater GGNRA, the Presidio is used heavily by local residents, but nevertheless must be managed by the Trust to serve a larger constituency than the immediately adjacent communities. The Presidio is rich in national history and houses the nation's preeminent collection of historic military structures. To say that these characteristics, and others like them, should be managed only with a local constituency in mind is in the Trust's view inappropriately insular. In spite of doubts expressed by some commentors about the scope of the public interest in the Presidio, the Trust received comments on the Draft Plan and Draft EIS from every state in the nation except North Dakota. As noted earlier in Section 3.1 above, roughly 83 percent of the public comments on the PTMP and EIS were received from outside the City (58 percent from outside California).

The Presidio is not a neighborhood park, but is a national park in an urban area. The Presidio Trust, nonetheless, has a responsibility to its neighbors and recognizes the need to address relevant neighborhood issues. The Trust is continuing to actively work to identify and mitigate potential effects on adjacent neighborhoods and to solve problems brought to the Trust's attention by its neighbors. As an example, the Final EIS includes mitigation measures to address potential future traffic congestion at local intersections outside the park. The Trust will continue to pursue good relations with residents near the Presidio, but cannot do so at the expense of turning the Presidio into a local park with a purely local constituency.

VI-4. ***Develop Vision through a Public Process***

The NRDC letter states that the Trust should not have "improperly" provided elements of a new vision outside of a public planning process, and should develop its own vision through an open public process.

Response VI-4 – The commentor mistakes a characterization made in the September 2001 Presidio Post, the Trust's monthly public newsletter, as an articulation of the Plan's vision statement. The Trust's initial vision statement was published as part of the Draft Plan in July 2001. This commentor criticized the Draft Plan for not "clearly stat[ing a] comprehensive vision analogous to that of the original GMPA," and for some reason looked outside the Draft Plan for a different statement. The commentor found on page 2 of the September 2001 Post a statement about the Presidio as a "center for arts, education, and innovation," but the Draft Plan had made no mention of this as part of its vision. This issue of the Post cited by the commentor preceded the close of the public comment period on the Draft Plan, and so could not have reflected any modifications by the Trust as none had been considered, proposed, or adopted at that time.

As described in responses, above and below, the Final Plan includes a clear description of the plan "vision," developed as a direct result of public comments and suggestions. This vision embraces the overall mission of preserving the Presidio, but rejects the notion of the GMPA that the park must have a higher social purpose.

VI-5. ***Describe Differences from the GMPA Vision***

One individual asks the Trust to describe how its vision differs from the GMPA vision, and if and how Trust Board Resolution 99-11 changed the GMPA vision. The Pacific Heights Residents Association tells the Trust that it does not recognize Resolution 99-11 as an adequate replacement for the GMPA's objectives. ("Resolution 99-11 is sufficiently vague to allow for almost any kind of development in the Presidio and provides for uses antithetical to a National Park.") Another individual states that Resolution 99-11, "which formalizes the GMPA's General Objectives ignores or dilutes the GMPA's central objectives, dangerously broadens the range of potential uses, and threatens the creation of a cohesive national park as envisioned under the 1994 GMPA." The commentor continues, "Resolution 99-11 makes no mention of creating an environmental study center, it ignores or dilutes some of the GMPA's other central objectives (such as minimizing new construction, attracting mission-related tenants, relying on tenants – in concert with the NPS – to provide public-interest programs, and committing to a modest level of overall activity and visitation). And Resolution 99-11 dangerously broadens the range of potential uses of the Presidio to include unspecified 'research, innovation, and/or communication."

Response VI-5 – In response to comments, the Final Plan includes a clear description of the GMPA vision and how that vision will be modified by the Plan. The GMPA presented a vision in which tenants in the Presidio would address "the world's most critical environmental, social, and cultural challenges."

The GMPA's vision was also based on four principal assumptions: (1) that Congress would continue to appropriate funds for the Presidio, (2) that tenants who shared the GMPA vision would be found who would have the capacity to undertake rehabilitation of historic buildings as well as provide programs, (3) that philanthropic dollars would be found to make up the short-fall, and (4) that time was not a significant factor. Time, changing circumstances, and experience have eroded each of these assumptions.

The Presidio Trust Management Plan owes much to the GMPA that preceded it, but the PTMP is built on a very different financial reality: (1) Congress has said it will not continue to appropriate funds and appropriations will decrease to zero by 2013, making near-term revenues critical to operation and maintenance of the park over the long term; (2) the Trust's expectation is that limiting the pool of potential tenants to only those who share the GMPA vision, will make it difficult or impossible to attract the number and variety of financially viable tenants needed to rehabilitate and reuse the Presidio's historic buildings; (3) while the Trust welcomes and will pursue philanthropic dollars, they cannot be viewed as a certainty or counted on as a way for the Trust to meet its financial obligations; and (4) the Trust is aware that time is criteria factor given with the end of appropriations in 2013 and the rapid deterioration of resources.

As described in the Final Plan, the Trust's vision was created by Congress to preserve the Presidio as a park for the American public. This vision is neither mundane or insufficient, and the challenges it imposes are formidable. The task is to safeguard for posterity one of the world's great natural settings and the nation's most complete assemblage of military architecture. The Presidio's buildings must be leased to pay for the restoration and maintenance of the park, and if they are not, the park will cease to exist. The Trust's Plan in no way precludes the kinds of activities that the GMPA envisioned, but the Trust cannot give priority to those activities over the core mission of rehabilitating the buildings and preserving the natural and cultural resources of the Presidio for the public.

Some commentors would like the Trust to evaluate whether the General Objectives of the GMPA articulated in Trust Board Resolution 99-11 changed the GMPA vision. They do not. In July 1994, the NPS adopted the GMPA and Final EIS to guide planning for the Presidio. The GMPA is contained in the 150-page document entitled Creating a Park for the 21st Century: From Military Post to National Park, Final General Management Plan Amendment, Presidio of San Francisco, Golden Gate National Recreation Area, California. Initial drafts of legislation that eventually became the Trust Act required the Trust to manage the Presidio in accordance with the GMPA. See U.S. Congress 1993, 1995. The term "general objectives" was added, however, in recognition of both the Trust's need for flexibility in light of changing conditions and the need to meet the 2013 deadline for self-sufficiency. In this regard, the House Resources Committee noted: "The Committee finds that the cost of the plan for the Presidio as completed by the NPS is unrealistic. While

the Committee does endorse the 'general objectives' of the [GMPA], the Committee recognizes that development of a reasonable program is essential to ensure the success of the Presidio Trust and the long-term preservation of the historical and other resources of the Presidio" (U.S. Congress 1995). The Trust Act directs the Trust to fulfill both the purposes outlined in Section 1 of the 1972 legislation creating the GGNRA and to follow the "general objectives of the GMPA." Congress, therefore, explicitly did not accept all of the particulars of the GMPA because of conflicts with the economic requirements and the changing user environment already evident in 1996 when the Trust Act was enacted. Congress intended that its directive to follow the "general objectives" of the GMPA "be interpreted to mean such things as the general relationship between developed and undeveloped lands, continued opportunities for public access and protection of the most important historic features as expressed in the Plan, not to mean any specific elements of the Plan" (Hansen 1999).

The term "general objectives" of the GMPA as enacted as part of the Trust Act was not precisely identified either by Congress or within the text of the GMPA. It therefore fell to the Trust to interpret the provisions of its authorizing statute. See Response EP-5. Construction of a statute which is open to interpretation by the executive agency charged with implementing its provisions is a basic maxim of administrative law. The Trust's adoption of Resolution 99-11 ensured a common understanding of how the Trust would interpret the statute and memorialized a comprehensive set of objectives that are not only true to the spirit of the GMPA, but are also consistent with congressional guidance for the management of the Presidio and with the meaning of the term as used in the Trust Act.

The Trust disagrees with commentors that the General Objectives "ignore or dilute the GMPA's central objectives." The specific ideas noted by commentors (i.e., creating an environmental study center, minimizing new construction, attracting mission-related tenants, relying on tenants to provide programs) are the means specified in the GMPA to achieve what are its larger objectives, such as preserving and enhancing Presidio resources; addressing the needs of Presidio visitors, tenants and residents; increasing open space, consolidating developed space, providing for appropriate uses of the Presidio; and sustaining the Presidio indefinitely as a great national park in an urban area. The General Objectives defined in Trust Board Resolution 99-11 take from the GMPA the broader goals that are consistent with Congress' intent.

It is the Trust's Final Plan, rather than the General Objectives defined in Trust Board Resolution 99-11, that adjusts the 1994 GMPA vision by focusing on the Trust's core mission of preservation and enhancement of Presidio resources rather than on creating a center to address "the world's most critical . . . challenges." The Board Resolution defining the General Objectives takes into account the legislative intent not to restrict unduly the efforts of the Trust to achieve its goals under the mandate imposed by Congress; this level of generality is appropriate because the General Objectives are not the land use plan or management policy of the Presidio. It is the Final Plan that establishes the framework and guidance for how the General Objectives are to be attained.

VI-6. *Retain the 1994 GMPA Vision*

A number of commentors recommend that the Trust should implement the original vision for the Presidio articulated in the GMPA ("to create a global center dedicated to addressing the world's most critical environmental, social, and cultural challenges") rather than replace it. NPS acknowledges that the Trust's financial mandate (to be financially sustainable by 2013) necessitates some revisiting of the GMPA. At the same time, NPS believes that the fundamental course for the Presidio as adopted in the GMPA should remain the same: "The Presidio's unique park character – its significant cultural, natural, scenic and recreational resources – must be the cornerstone that guides our vision." The NPS urges that "[l]and use and leasing proposals should not drive the direction of the overall plan." ("The value of the Presidio to future generations of this nation is that it is, no matter the management structure, a national park."). They ask the Trust to "stay on a course that … preserves the visitor experience originally planned for this park."

Commentors note that the GMPA vision was a product of a four-year planning process that included "wide, deep, and exceptional" public involvement. They observe that the mandate of preserving the Presidio's historic, natural, and recreational resources was at the heart of GGNRA legislation and was reiterated in the Trust Act. They also believe that the original vision ("the challenge of shifting the world from swords to plowshares, from war to peace

and plenty") was as inspiring as the nature of the park resource itself. They contend that the PTIP vision is not of the same caliber, nor is its expression in the plan as evocative of the public input. ("The original vision must not be lost. The lack of mention of the substance of the GMPA mission is disturbing.") The Tides Foundation and others, such as the Pacific Heights Residents Association, allege that the Trust has abandoned the theme of global sustainability entirely. They maintain that the focus on operating costs, building projects, and the Trust's primary control of programming in Area B is "hardly visionary." Instead, they request the Trust to adopt a vision similar to the GMPA vision that "recognizes that national security is no longer based solely on political and military strength, but on stewardship of the world's human and physical resources through global cooperation." The Presidio Tenants Council notes that tenants used to be responsible for playing a role in the vision of the park, and that responsibility should remain with the tenants and be supported by the Trust. They invite the Trust to bring "experts in the world scene and identify groups who look at world issues and those who are working on those issues." ("These are the individuals and groups who belong in the park.")

Response VI-6 – The Trust fully recognizes that the 1994 GMPA vision was one that captured the interest of many. Under that vision, the Presidio would not simply be preserved but would serve a purpose greater than itself, to work toward resolving the world's most critical environmental, social, and cultural challenges. It would accomplish this higher purpose by housing "a network of national and international organizations devoted to improving human and natural environments and addressing our common future." In essence, the GMPA vision was that those who would have the privilege of occupying Presidio buildings would be held to a higher standard; they would have to demonstrate commitment to the higher purpose of addressing the world's critical challenges.

The Trust's Plan no longer makes adherence to such a vision a mandatory pre-condition for all tenants (although it welcomes those who share it). The Final Plan does retain what is to the Trust and what is acknowledged by some to be the cornerstone of the GMPA, the Trust Act and the GGNRA Act – preservation of the Presidio's "significant cultural, natural, scenic, and recreational resources." The Trust's vision is the one established by Congress, to preserve the Presidio and its resources as a park for the American public – to rehabilitate its buildings and to preserve the natural, cultural, scenic, and recreational resources that were the reasons the nation moved to protect it. To adopt the GMPA vision would require the Trust to lease only to "a network of national and international organizations devoted to improving human and natural environments and addressing our common future" so as to "creat[e] a global center dedicated to addressing the world's most critical environmental, social, and cultural challenges." While the Trust welcomes the types of tenants and activities called for in the GMPA vision, the Trust cannot limit itself to soliciting and leasing to only those tenants dedicated to solving the world's most critical challenges without jeopardizing our more fundamental mission – permanently preserving the park and its resources. The challenges that mission imposes are formidable: the buildings must be rehabilitated and leased to pay for the park, and if they are not, the Presidio will cease to be protected federal parkland. Instead, it will be transferred to the General Services Administration (GSA) to be disposed of as federal property and deleted from the boundaries of the GGNRA. The price of failure is high, and the Trust therefore cannot allow a policy – one that was neither mandated nor embraced by Congress – to take precedence over the mission.

Instead, as stated in the Final Plan, the Trust envisions a place where public, private, and non-profit sectors come together and share their ideas and resources; where educators and students explore the world around them; where artists, scientists, and storytellers pursue their passions; where parents and children play; where visitors deepen their understanding of the connections between human and natural history; and perhaps most important, where an individual, alone or in concert with others, can find peace of mind and personal inspiration.

VI-7. *Emphasize the Swords into Plowshares Concept*

Some commentors advocate that the Presidio's vision should symbolize the swords-into-plowshares concept. Presidio Challenge asks "Why has the Trust thrown out the GMPA vision statement, particularly the 'swords-to-plowshares' concept?" San Francisco Tomorrow questions "What happened to the guiding philosophy that this is a time to give back a 'park to the people' and with tenants whose purpose is 'swords into plowshares'?" Another

individual writes "The events of September 11 demonstrate that such a center is desperately needed, now more than ever before."

Response VI-7 – The Presidio cannot help but symbolize the swords-to-plowshares idea; it was a military post for more than 220 years and is now a new kind of national park. By focusing on the Presidio's historical resources and emphasizing active public use for generations to come, the Trust's vision retains the sword-to-plowshares ideal and seeks a park for the people. The swords-to-plowshares concept is also related to one of the five themes included in Chapter One of the Final Plan as the subject of collaborative planning between the Trust and the NPS. At the commentors' suggestion, the theme related to transformation of the Presidio "from Post to Park" is described in part through the phrase "swords-to-plowshares." With other interpretive themes, this subject may serve as the basis for future interpretive programming, offering the public a deeper understanding of the past, present, and future of the Presidio.

4.5 ALTERNATIVES (AL)

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SUPPORT FOR DIFFERENT PLAN ALTERNATIVES

AL-1. *Implement the 1994 GMPA*

A number of individuals urge the Trust to re-commit to the GMPA adopted in 1994. These individuals feel that the GMPA remains the most desirable guiding document for the Trust because it engendered broad public support, best protects the park's historic and natural resources, and minimizes new construction. One individual asks "Since the Presidio Trust documents show that the GMPA meets the Congressional mandate of achieving financial self-sufficiency by the year 2013, why doesn't the Trust implement the GMPA?" Another individual: "Now is certainly not the time considering the psychosocial climate of the US to veer drastically and unnecessarily from a perfectly good, widely-agreed-upon plan that the NPS worked on with massive public input and support. A hundred or so years of dealing with similar issues has taught them a thing or two about how to proceed even with such new projects and ideas. Stop trying to end-run the professionals—and the public." Another commentor believes that the Draft Plan "was created to circumvent the GMPA."

Response AL-1 – The 1994 GMPA in all its original content simply is no longer a physical possibility; it cannot be implemented exactly as it was written. Preparation of the GMPA began in 1990, spanned four years, and another eight years have passed since the NPS finalized and adopted it in 1994. Altogether, it has been almost 12 years since the concepts of the GMPA were proposed, evaluated, and adopted. The 1994 GMPA is a relatively prescriptive and site-specific plan. A plan like the GMPA is a living document and inexorable changes that accompany the passage of time tend to limit the shelf-life of any plan that is so specific and prescriptive.

Therefore, to the extent commentors are requesting that the Trust default back to the 1994 GMPA and adopt and implement it in all its particulars and details, that is not possible. As examples, the Letterman Complex EIS modified the GMPA with respect to the specific plan for the former LAMC and LAIR facilities that have now been demolished. Also, the location of the Presidio fire station was moved (under a proposal by the NPS) to a different location (i.e., its existing and historic location) from that called for in the GMPA. Also under an NPS proposal, the buildings along O'Reilly Avenue have been rehabilitated and reused as office space (part of the Thoreau Center for Sustainability), rather than lodging as prescribed by the GMPA. The GMPA assumed that the Sixth U.S. Army would continue to use approximately 30 percent of the Presidio's square footage of building space, including about half the available housing. The Army's presence was anticipated to be a significant benefit to the Presidio; the Army was to pay for direct expenses for buildings, facilities, and other occupied property and would share the operating expenses common to Presidio tenants. Shortly after the NPS adopted the GMPA, however, the Department of Defense decided to move the Sixth U. S. Army and to vacate the Presidio permanently. The Army's departure had a dramatic effect on the GMPA's building occupancy projections. The GMPA assumed that the Sixth U.S. Army would occupy 277 buildings, comprising 1.8 million square feet of residential and non-residential building space (totaling 30 percent of the Presidio square footage), for an indefinite period, but the Army had largely departed the Presidio by 1994.

These and other changes, including creation of the Presidio Trust, have altered the GMPA in all of its exact detail as it was conceived and adopted in 1994. Please refer to Chapter 1 (Purpose and Need) of the Final EIS (Volume I) for additional information on this subject.

Nevertheless, there are many aspects of the GMPA that are still possible to implement. These elements of the GMPA have been carried forward into the No Action Alternative (GMPA 2000) for consideration in this planning process. As noted in the Alternatives Section of the EIS, "This [GMPA 2000] alternative would implement the 1994 GMPA for the Presidio assuming year 2000 conditions." Furthermore, many features of the 1994 GMPA have been carried forward into all alternatives, including the Final Plan Alternative, as common features. They are generally policies and actions from the original GMPA that the Trust has been implementing and that remain viable regardless of other planning considerations. These common features are explained in Section 2.2 of the EIS and include continuation of many existing leases, removal of Wherry Housing, an emphasis on historic building rehabilitation, and housing of Presidio-based employees.

The No Action Alternative (GMPA 2000) was formulated to reflect updated conditions, not to "circumvent the [original] GMPA" as one commentor contends. Quite to the contrary, the No Action Alternative (GMPA 2000) is a version of the original GMPA created as a viable option for consideration even though the original 1994 GMPA could have been screened out as financially infeasible. Through the consideration and evaluation of the No Action Alternative (GMPA 2000), the Trust has made it possible, as urged by commentors, to consider a re-committment to the GMPA, assuming that all present day (Year 2000) conditions exist.

The Trust believes it is important for commentors to understand this distinction between the original GMPA and the No Action Alternative (GMPA 2000). For example, some comments assert that the GMPA meets the Congressional mandate of financial self-sufficiency, and the Trust should simply implement it. In fact, the 1994 GMPA was far from self-sufficient. It assumed $16 to $25 million in annual federal funding in addition to federal subsidization through Army tenancies. It also assumed any financial shortfall would be made up through philanthropy. In no way is the original 1994 GMPA financially self-sufficient. It is only with current updates and modifications through the year 2000 that the No Action Alternative (GMPA 2000) had the potential to become financially self-sufficient. This potential is based upon a number of conservative but favorable financial assumptions made for purposes of the financial analysis of planning alternatives. See Responses FI-15 through FI-24 for further discussion of the financial viability of the No Action Alternative (GMPA 2000).

AL-2. *Adopt the Draft Plan, a Modified Draft Plan, or the No Action (GMPA 2000) Alternative*

Some commentors write to register their support for the Draft Plan, a variation of the Draft Plan, or the No Action Alternative (GMPA 2000). Some commentors urge the Trust to adopt the Draft Plan for such reasons as "it very ably balances the many interests of all segments of Bay Area society," or "responds well to the challenges of an urban park." (Commentors also offer that the EIS is "thorough and comprehensible and in need of no further circulation or amendment.") San Francisco Beautiful supports the Draft Plan (with modifications) and its "attempt to balance the Presidio's values of natural open space, history, scenic views, education, and recreation." Others express confidence in the Trust for preserving the park and for "a job well done."

The largest group of commentors, including many of the neighborhood organizations, urge the Trust to adopt an alternative based on the spirit and vision of the original GMPA ("...because it's financially viable, it's what the public wanted in 1994 and what the public wants now and that tenant organizations in a National Park should be programmatic park partners.") Some of the commentors offer that they recognize that the GMPA requires updating in order to reflect "the realities of the Trust Act as well as four years of experience with potential tenant interest and program support" but feel that the extent of changes called for in the Draft Plan is "unnecessary and in many ways detrimental." Other organizations, including PAR and the Lake Street Residents Association, state that the Draft Plan should be substantially modified in scale and design to "more closely reflect the GMPA 2000 and the original vision and goals of the GMPA of 1994." NAPP makes an "overarching request" to have the Draft Plan more closely reflect the 1994

GMPA by "reducing the level of new construction and operating costs and place a priority on leasing buildings to GMPA mission-related tenants."

Response AL-2 – The Final Plan proposed and distributed by the Trust, along with the Final PTMP EIS, have not been adopted by the Trust Board. It is offered as the Trust's proposed Final Plan based upon the Final Plan Alternative analyzed in the Final EIS (which is the Trust's preferred alternative). Under NEPA, the Trust has not and cannot finalize its Plan until it prepares a Record of Decision selecting from among the alternatives and explaining the basis for the alternative's selection. Refer to Response EP-34 for additional information on the Record of Decision. The response offered here concerning the proposed Final Plan is preliminary and based upon the entire record to date.

As its proposed Final Plan, the Trust has not followed the urging of many commentors to conform to an alternative as closely aligned as possible with the original GMPA (i.e., the No Action Alternative (GMPA 2000)). Nevertheless, in proposing the Final Plan, the Trust has fully and seriously considered the No Action Alternative (GMPA 2000) as a plan option. The discussion below focuses on those aspects of the No Action Alternative (GMPA 2000) that commentors most wanted the Trust's proposed Final Plan to retain and explains the basis for proposing a different approach.

Many commentors who favor the No Action Alternative (GMPA 2000) express their approval of its vision, tenant selection standards, and approach to programming. Under the GMPA approach, tenants would give the Presidio a higher purpose. They would be selected based upon their organization's purpose and ability to contribute to "improving human and natural environments" and "addressing the world's most critical environmental, social, and cultural challenges" and to provide park programs on these and other related themes (e.g., global cooperation, environmental sustainability). The goal of all tenant selection would be to turn the Presidio into a global center dedicated to addressing world challenges. Although it has captured the imagination of many commentors, the GMPA vision, particularly as it is tied to and places constraints on tenant selection, poses the greatest implementation difficulties for the Trust.

These difficulties derive from the ways in which the GMPA vision, tenant selection, and programming approach potentially conflict with the Trust's core mission. As described further in the Final Plan itself, that basic mission is to preserve the Presidio as federal parkland and to protect the Presidio's cultural, natural, scenic and recreational resources for public use. The Trust's mandate is not to create a global center, nor to solve the world's problems, nor even to create a park with any purpose higher than the one that Congress created the Trust to uphold. The challenges posed by the Trust's Congressional mandate alone are formidable. As recognized by Congress, the Presidio contains unique historic structures that are extremely expensive to rehabilitate and maintain. Congress has mandated that the Trust lease Presidio property in order to generate the revenues needed to undertake capital improvements, estimated at $589 million, and to support its long-term operations and maintenance, estimated at between $37.3 to 52.8 million annually. If the Trust is constrained to seek out only specific types of tenants with a socially-oriented focus, that constraint makes the Trust's financial success much more difficult to attain and therefore jeopardizes the successful protection of the park itself by irreparably burdening the Trust's capacity to lease the buildings.

The entrepreneurial change imposed by Congress, requiring the Trust to lease Presidio buildings to pay for the park, has created uncertainty in the minds of some commentors about the future of the park itself. The fear that the park will become nothing more than a real estate operation that "rents to the highest bidder" has replaced the fear that the park will be lost to the public if we cannot make it pay for itself.

Both anxieties indicate that the Trust's financial requirement and its mandate to preserve and protect the park cannot be separated. Financial self-sufficiency can be achieved in any number of ways, but if it is done without ensuring the rehabilitation of the Presidio's historic buildings and landscapes, the restoration of its natural resources, and the preservation of its distinct character, the goals set forth by Congress will not have been accomplished. The Trust therefore opted in its proposed Final Plan for the more conservative, albeit less ideologically captivating, focus on solely preserving and enhancing park resources, rather than on doing so while creating a "global center" to address the world's problems. The Final Plan envisions a diversity of tenants: non-profit and for-profit, large and small, with no explicit requirement that

they all pursue a related mission. In the Trust's judgment, this approach has a higher likelihood of financial success and a higher likelihood of ensuring the timely preservation of the Presidio's resources.

Other primary reasons some commentors note for favoring the No Action Alternative (GMPA 2000) include its smaller amount of building space, the smaller amount of potential new construction, and the generally lower level of public uses and therefore visitor activity. When viewed in comparison to the No Action Alternative (GMPA 2000), these commentors frequently characterized the Draft Plan Alternative as having excessive and inappropriate development, programming and activity. Clarification and modifications made in response to comments and now reflected in the Final Plan Alternative may ameliorate commentors' concerns about "excessive development." Furthermore, the Trust believes and expects that a more clear and concise description of the proposed Final Plan will make what appeared to be drastic differences between the Draft Plan and the No Action Alternative (GMPA 2000) less significant.

The Final Plan now makes clear that the PTMP calls for reducing existing developed space. The Final Plan proposes to reduce the number of presently existing buildings, eliminating 360,000 square feet or more of building space over time and thereby expanding open space in Area B by almost 100 acres. (This was also true of the Draft Plan Alternative, but apparently was not clear to reviewers.) Therefore, under the Final Plan Alternative, approximately 75 percent of the Presidio will be open space, much of it providing valuable natural and endangered species habitat. Buildings and activities will be concentrated in already developed areas with easy access to transportation, reinforcing community life, reducing automobile use, and making land use patterns and resource use more sustainable. Of the building space, about one-third (a similar percentage to the GMPA) is proposed for public purposes, including educational and cultural uses, interpretation, small-scale lodging, and other visitor amenities. Another third (a higher percentage than in the No Action Alternative (GMPA 2000)) will provide housing, and the remaining third will be used primarily as office space (a similar percentage to the No Action Alternative (GMPA 2000)). The Trust does not agree that this Plan – which increases open space, reduces overall building space, and provides for more visitor-serving uses – is "excessive development."

The fact that seems to have evoked the greatest concern is the potential for new replacement construction. Commentors seem to suggest that the Plan's potential for new construction will be misused to turn the Presidio into an urban redevelopment area indiscernible from its City surroundings. That is simply not the case. The proposed Final Plan calls for demolition of about 1.1 million square feet of existing building space, mostly non-historic housing units that would be removed to enhance and restore natural riparian and endangered species habitats. The Final Plan allows the possibility, not the certainty, that up to about 700,000 square feet of this demolished space could be replaced in already developed areas. The purpose of new construction would not be unfettered new development to "urbanize" the Presidio, but rather replacement construction targeted at accomplishing other policy goals of the Final Plan.

Specifically, new construction in the form of building additions or annexes may allow the best opportunity for adaptive reuse and rehabilitation of the Presidio's historic structures. The Trust does not want to be precluded from considering this type of new construction as an option for preserving the Presidio's historic building resources. Furthermore, because the Plan calls for removing so much of the existing housing stock within the Presidio to achieve open space gains, the Trust does not want to be precluded from replacing some of these units through the construction of new, more modern units better suited to present-day housing demand. Replacement of these units is desired both because housing provides the most stable revenue source to support other Presidio needs and also because providing sufficient housing for those who work within the Presidio is a means to re-create community values that have always been a part of the Presidio's history, to reduce automobile trips and impacts, and to ameliorate the housing shortage in the greater San Francisco area.

The potential square footage envelope of new replacement construction under the proposed Final Plan is higher than that in the GMPA largely because of the difference in the housing policies between the two alternatives. Under the No Action Alternative (GMPA 2000), housing is removed with no certainty of replacement, whereas in the Final Plan Alternative, most or all of the removed non-historic housing units would be replaced. The Final Plan allows for the possibility that this housing goal could be achieved partially through new

replacement construction (of 200 to 400 units). New replacement construction to meet housing goals would be only one tool for replacing housing units; others would include subdivision of existing housing units and conversion of non-residential space to residential use.

There may also be other good reasons to consider using new replacement construction as a Plan management tool that cannot now be foreseen under the proposed Final Plan. In fact, the GMPA itself called for about 171,000 square feet of new construction before 2000 and about 220,000 square feet total by 2010, in addition to new construction on the Letterman Hospital site. So even the GMPA recognized that new construction could serve legitimate purposes, particularly in areas where so much emphasis is placed on reusing buildings. To some, the GMPA's level of new construction may seem acceptable while that of the PTMP does not because the location and purpose of new construction was generally specified in the GMPA; all but 100,000 square feet of new construction was generally located on the various illustrative plans. As it turns out, the instances of new construction specified in the GMPA have not served the realistic needs of rehabilitation projects and therefore have not proved accurate. The Final Plan does not repeat this error. Instead, the proposed Final Plan addresses public concerns and the uncertainty regarding the location and need for new construction through qualitative guidelines and procedural safeguards. If or when the Trust proposes significant new construction, the proposal will be subject to full and appropriate public and environmental review as well as historic compliance review under the NHPA before any action is approved. Thus, the public's fears that the Trust intends to use new construction to "over-develop" the Presidio are not borne out by the content of the proposed Final Plan.

Lastly, many commentors favor the No Action Alternative (GMPA 2000) because it provides for a smaller volume of visitors to the Presidio, and smaller volumes of residents and employees. Both the No Action Alternative (GMPA 2000) and the Final Plan Alternative share a dedication to the preservation of open spaces. Under the No Action Alternative (GMPA 2000), the public would enjoy numerous opportunities to use, enjoy, and learn from the Presidio's substantial open spaces and natural areas. The Trust fully agrees that the Presidio is a magnificent and scenic area of open space within a large urban area where open space is an important and even essential refuge for park visitors and urban dwellers alike. As with the No Action Alternative (GMPA 2000), the proposed Final Plan offers these same opportunities.

One difference between the alternatives is in the extent to which the building space at the Presidio would generate interest for visitors in each. Under the No Action Alternative (GMPA 2000) and the Final Plan Alternative, a similar percentage of Presidio building space is anticipated to be used by public or visitor-serving uses, including cultural uses, park programs, education programs, lodging and meeting space, recreational space, and other visitor amenities. This percentage equates to about 130,000 more square feet in the Final Plan Alternative. Under the Final Plan Alternative, a higher percentage of building space (about 640,000 square feet more building space) is anticipated to be in residential use than in the No Action Alternative (GMPA 2000), and a similar percentage of building space (about 160,000 square feet more building space in the Final Plan Alternative) is anticipated to be in office use.

In crafting the Final Plan, the Trust has carefully taken into consideration the extent of environmental impacts of each alternative. While the level of use and therefore the extent of impacts is somewhat lower under the No Action Alternative (GMPA 2000), the impact assessment of the Final Plan reveals that the projected number of Presidio residents and employees would not differ significantly from 1990 levels, when the Army occupied the Presidio,[1] and that visitorship levels (revised in the Final EIS) would not result in unmitigable impacts. Since the 1989 base closure announcement, the level of activity in and around the Presidio has been quite low, and the local public has become accustomed to that lower level of activity. That does not mean, however, that a low level of activity should be pursued as a policy goal. The

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[1] For historical comparison, in 1990 during the Army's occupation of the site, there were approximately 5,500 employees at the Presidio with 4,700 living on-site. The Final Plan Alternative projects a somewhat higher number of employees (6,890) but also a smaller number of residents (3,770). Under the No Action Alternative (GMPA 2000), 6,460 employees are projected and, due to the removal without replacement of housing, significantly fewer residents (1,660).

Trust believes its efforts should go toward limiting inappropriate and excessive use of the Presidio that could lead to larger than necessary environmental impacts (such as unnecessary automobile use). These potential impacts will be limited to the extent possible by implementing environmental mitigations identified in the EIS, as well as in the Final Plan itself, which includes a very aggressive transportation demand management program.

The Trust does not believe, however, that the Final Plan or its policies should discourage public use of the Presidio. The Trust believes that establishing other public-serving uses within the buildings of the park, even and especially if these uses draw visitors, is important and appropriate exactly because the Presidio is a public park. The Final Plan therefore envisions a variety of cultural uses, including the possibility of interpretive sites, museums, artist studios, performing arts venues, or others, located principally at the Main Post and along Crissy Field (Area B). These uses may draw more visitors than the mix of uses under the No Action Alternative (GMPA 2000), but the Trust believes encouraging public visitation of a national park is appropriate, particularly where that level of use will not substantially differ from past levels of use of the site, or result in unmitigable impacts.

For all of these reasons and others, the Trust believes that its proposed Final Plan is, as a few commentors note, a good balance among the Presidio's diverse and sometimes competing values, and the Final Plan Alternative is the Trust's preferred alternative.

AL-3. ***Adopt the Minimum Management Alternative***

A few individuals state that the Minimum Management Alternative is "far and away" the best alternative for complying with the Section 104(c) requirement of the Trust Act to reduce expenditures and increase revenue to the federal government. One individual advocates the Minimum Management Alternative on the basis that it "will provide the Presidio with the best possible financial cushion against adverse economic conditions and unforeseeable heavy expenses, such as natural catastrophes." Another individual believes that the Minimum Management Alternative "appears to be the most cost effective and the least harmful to this historic site."

Response AL-3 – Primarily for the reason explained below, in addition to other reasons that may be more fully expressed in the PTMP Record of Decision, the Trust chose not to propose the Minimum Management Alternative as its Final Plan or identify it as the preferred alternative.

The Trust recognizes, as these commentors point out, that the Minimum Management Alternative would achieve financial self-sufficiency and full implementation of capital improvement needs for the Presidio more quickly than any other alternative. In this respect, it has the potential to be financially more successful than any other alternative. The Trust can achieve financial self-sufficiency in any number of ways, however, and financial success cannot be viewed independently from other plan goals. This alternative fails to increase open space, fails to restore critical natural habitats, provides limited experiences for the park visitor to use or enjoy Presidio building space, and comes as close as any alternative to commentors' fears of turning the Presidio into a "business park" because building users are selected primarily for their ability to pay the highest rent. Therefore, in the Trust's view, this alternative places undue emphasis on maximizing financial returns at the expense of other important policy goals related to the core mission of the Trust.

EVALUATION OF OTHER ALTERNATIVES

AL-4. ***Address the Proposal Made in Scoping Comments***

Several commentors maintain that they provided the Trust with proposed alternatives as part of their scoping comments for inclusion in the Draft EIS, and that their alternatives were not "properly constructed" for consideration. One group of natural resource conservation organizations states: "We regret that the Trust… chose to develop their own GMPA alternative, rather than work with us to flesh out ours. Our option would have differed in key respects from the Trust's preferred plan as well as the GMPA 2000 alternative…" The NPS says that they asked the Trust to "examine the GMPA and develop an alternative that makes the minimal modifications necessary to the GMPA to allow the Trust the planning flexibility it feels is warranted."

Response AL-4 – The Trust disagrees with commentors that it failed to adequately address concepts and alternatives suggested during the scoping period. During the scoping period (from July 12, 2000 through January 16,

2001), the Trust took the somewhat unusual step of presenting for public comment proposed conceptual alternatives to be addressed in the Draft EIS. One of the scoping period alternatives (Alternative A) was an alternative based upon the 1994 GMPA. The Trust's initial financial analysis of this alternative predicted that the GMPA scoping alternative would not meet the financial threshold of self-sufficiency required by the Trust Act. Several groups submitted comments raising concerns that the Trust had constructed the scoping Alternative A so as to eliminate it from further consideration, and made suggestions in scoping comment letters to reformulate the No Action Alternative (GMPA 2000) for consideration in the Draft EIS to make it both true to the 1994 GMPA and also financially viable. The Trust did exactly that, as described in Response AL-1. The Trust patterned the No Action Alternative (GMPA 2000) on the 1994 GMPA, but modified it, s requested by scoping comment letters, in only those ways necessary to make the alternative financially viable. As the NPS requested, the Trust essentially found the "tipping point" where the GMPA would be a financially viable proposal for consideration. As explained in the Draft EIS (page 407), "Changes to the GMPA 2000 [scoping] alternative in response to scoping comments … converted this alternative into the one requested by commentors. Specifically, by modifying assumptions regarding the timing of demolition of Wherry housing and changes in conditions since the GMPA was adopted, the GMPA 2000 alternative has been made to 'work' from a financial perspective in that it would achieve self-sufficiency by 2013. This alternative now poses a viable option for decision-makers."

A number of different scoping comment letters asked that the Trust develop alternatives that analyzed a revised but financially workable version of the GMPA, and each contained somewhat different suggestions. The commentor now claiming that the Trust failed to consider its alternative, described as the "Revised GMPA Alternative," base their criticism on principles and characteristics, all summarized in bullet-point format, in their letter. All of the principles and characteristics were potential independent variables that could be associated with any alternative and that the Trust considered in developing the array of alternatives analyzed in the Draft EIS.

This of course was only one set of comments received during the scoping period, and the Trust had the challenge of incorporating the many diverse suggestions of a full array of commentors. The Trust weighed the similarities and differences among commentors' varied suggestions and developed a GMPA-based alternative, as requested, that addressed as many of the commentors' concerns and ideas as possible. Although some commentors would have preferred that their specific list of variables, components, and assumptions be developed into its own unique version of the No Action Alternative (GMPA 2000), NEPA does not require that the Trust analyze every conceivable alternative, only that the Trust consider a reasonable range. By assuring that each "principle" and "characteristic" offered by the scoping comments was encompassed within the array of alternatives considered in the Draft EIS, the Trust fully satisfied NEPA.

The text below provides a brief outline of where and how the different components of the scoping commentors' suggestions have been incorporated into the No Action Alternative (GMPA 2000) as well as across the range of alternatives:

Tennessee Hollow – Some scoping commentors asked that their requested "Revised GMPA Alternative" protect and enhance natural resources, including restoration and expansion of a viable Tennessee Hollow riparian corridor from its source to the Bay sufficient to create wildlife migration corridors. The No Action Alternative (GMPA 2000) formulated for analysis in the Draft EIS includes these elements.

Section 2.3 of the Draft EIS described common features for all of the alternatives, unless noted otherwise. Many of these common features were policies and actions that the Trust has either been implementing or believes remain viable. The degree to which these concepts would then be carried forward became variables within the alternatives, but the essence of each concept was assumed for all alternatives. The restoration of Tennessee Hollow was included as a common feature in all alternatives except Minimum Management. "As provided for in the 1994 GMPA, the Tennessee Hollow riparian stream corridor would be restored to the extent feasible following further study and environmental review." (Final EIS, Section 2.2.) As requested by scoping comments, the Trust included this element for analysis in the No Action Alternative (GMPA 2000). Existing non-historic housing units in the stream corridor would be removed to enable restoration of the

stream corridor. A similar level of restoration was considered in the Draft Plan Alternative and the other alternatives.

In the Final EIS and Final Plan Alternative, the commitment to the restoration of Tennessee Hollow is the same as in the draft documents, but with updated information on the Trust's work since the release of the draft documents. In Fall 2001, the Trust initiated planning for Tennessee Hollow with the goals of restoring a functioning stream ecosystem with associated riparian and wetland habitats; improving the quality of freshwater flows into Crissy Marsh; improving management practices in the surrounding watershed; protecting and enhancing cultural and archeological resources; providing recreational, educational, and interpretive opportunities; and adapting existing infrastructure to support the restoration. Planning for Tennessee Hollow is anticipated to be a near-term implementation activity following the completion of the PTMP process. See Responses PG-30, PG-31 and BR-5.

Crissy Marsh – Some scoping commentors asked that their requested "Revised GMPA Alternative" protect and enhance natural resources, including Crissy Marsh, and suggested demolition of the Commissary and PX to expand and create a working marsh and working riparian connection with Tennessee Hollow. The No Action Alternative (GMPA 2000) formulated for analysis in the Draft EIS includes these elements. Other scoping comments suggested keeping the Commissary and PX (without expansion or new construction) if needed for financial reasons, and other EIS alternatives incorporate this suggestion.

The No Action Alternative (GMPA 2000), consistent with the 1994 GMPA and scoping commentors' request, assumes that the Commissary and PX would be demolished to allow for marsh expansion into this area. In the Draft Plan Alternative, a commitment to study the feasibility and scope of marsh expansion into Area B, in part or in whole, as discussed in the No Action Alternative (GMPA 2000), was made. Under the Resource Consolidation Alternative, the treatment for marsh expansion was similar to the No Action Alternative (GMPA 2000). Treatment of marsh expansion under the Sustainable Community and Cultural Destination Alternatives was the same as under the Draft Plan Alternative. Under the Minimum Management Alternative, no expansion of the marsh was assumed.

Since the release of the Draft Plan and Draft EIS, the Presidio Trust, the NPS, and the GGNPA have entered into an agreement to undertake a technical study to identify a broad array of options to ensure the long-term health of the marsh, and to set forth the benefits, costs, impacts, and trade-offs associated with each option. In addition, for the next two years (the estimated duration of the study), the Trust will not undertake any new construction or long-term leasing in the immediate study area. This information is now included in the Final EIS as a common feature to all of the alternatives, except for Minimum Management. The Presidio Trust is committed to the long-term ecological health of the marsh, and this is stated clearly in both the Final Plan and EIS. A copy of the Letter of Agreement is included as Appendix C of the Final Plan. See Response BR-3 and BR-4.

Native Plants – Some scoping commentors asked that their requested "Revised GMPA Alternative" restore native plants in any area scheduled for demolition. The No Action Alternative (GMPA 2000) formulated for analysis in the Draft EIS includes this element through the Vegetation Management Plan (VMP), a plan called for by the 1994 GMPA and developed in partnership by the NPS and the Trust.

For all of the alternatives, vegetation resources would be enhanced in accordance with the approved VMP, which divides the Presidio into three vegetation management zones: native plant communities, forest, and landscape vegetation. The VMP provides a management framework and defines management actions for the revitalization of each of the three landscape types. See Draft EIS, Section 3.3.1 Affected Environment, Biological Resources. This means that for areas where building demolition is proposed, the site restoration for that particular area would follow the guidance of the VMP for that particular vegetation management zone as well as the planning guidelines for that particular planning district. Not all sites where building demolition may occur in the future are necessarily ideal candidates for native plant restoration. As an example, the removal of a non-historic building in the middle of a cluster of historic buildings might allow for the restoration of a historic setting, and the landscape for that setting might not necessarily be native plants. However, in other areas, such as the South Hills planning district where Wherry Housing is proposed for removal in all of

the alternatives except Minimum Management, the major impetus for building removal is to restore native plant habitat.

The EIS alternatives present a range of options for building demolition and increases in native plant restoration. Site-specific restoration treatments would be determined on a case-by-case basis, consistent with the VMP and the planning guidelines contained in the Final Plan. See Response BR-1.

Open Space – Some scoping commentors asked that their requested "Revised GMPA Alternative" maximize open space. The No Action Alternative (GMPA 2000) formulated for analysis in the Draft EIS includes open space coextensive with what the 1994 GMPA provided, or an increase of about 100 acres. Some comments also ask that the Trust deed all open space/natural areas back to the NPS. For the reasons set forth in Responses OS-5 and FI-12, none of the alternatives includes this element.

Maximizing open space results in inherent trade-offs among different resource values. Maximizing open space suggests removal of historic resources, and demolition of historic structures was constrained under the 1994 GMPA. So as to be as consistent as possible with the 1994 GMPA, the No Action Alternative (GMPA 2000) was not formulated to reflect the maximum open space acres. Rather, the alternatives in the EIS present a range of open space increases that could be accomplished while still meeting other plan objectives. All of the alternatives achieve a net increase in open space over existing conditions. The Resource Consolidation Alternative maximizes the increase in open space (because it assumes the removal of the entirety of the Public Health Service Hospital, including the historic portions), with an increase of about 44 acres more than the No Action Alternative (GMPA 2000). The Sustainable Community Alternative has the smallest increase (besides Minimum Management) at about 75 acres, or 25 percent less than the No Action Alternative (GMPA 2000). The Final Plan Alternative would include roughly the same amount of open space as the No Action Alternative (GMPA 2000). Also see Responses OS-1 through OS-4.

Interpretation Programs – Some scoping commentors asked that their requested "Revised GMPA Alternative" include the concept that the NPS should provide interpretation services for the Presidio under an MOA with the Trust. The No Action Alternative (GMPA 2000) assumes this role for NPS.

The 1996 Presidio Trust Act sets forth the statutory framework for the relationship between the NPS and the Presidio Trust. The NPS is responsible "in cooperation with the Trust for providing public interpretive services, visitor orientation, and educational programs on all lands within the Presidio." This is stated as one of the common features among all of the alternatives, including the No Action Alternative (GMPA 2000) and the Final Plan Alternative, as is completion of an interpretive plan for the Presidio, jointly prepared by both agencies. The William Penn Mott, Jr. NPS Visitor Center would also continue to be operated as the main visitor orientation and contact point under all of the alternatives. Section 3.4.4 of the EIS provides more detail about the current status of Presidio interpretation and the relationship between the NPS and the Trust regarding implementation of interpretive programs at the Presidio. Also see Response PR-4.

New Construction – Some scoping commentors asked that their requested "Revised GMPA Alternative" keep new construction to an absolute minimum, and preclude creating any new "visitor-magnets." As requested by scoping commentors, the No Action Alternative (GMPA 2000) assumes a minimal amount of new construction (a total of up to 170,000 square feet), and derives its assumption from the extent of new construction allowed under the 1994 GMPA. See Response AL-2.

The other alternatives in the Draft EIS present a range for levels of new construction. The Minimum Management Alternative assumes no new construction, similar to the Final Plan Variant included in the EIS at the request of commentors on the Draft EIS. See Response AL-5. The maximum level of new construction allowed, a total of 1,370,000 square feet, is evaluated as part of the Cultural Destination Alternative.

Crissy Field – Some scoping commentors asked that their requested "Revised GMPA Alternative" allow no new construction at Crissy Field and specifically none between Crissy Field and Doyle Drive. The No Action Alternative (GMPA 2000) formulated for analysis in the Draft EIS includes this assumption at a level of analysis consistent with the programmatic nature of the alternatives and EIS, calling for a net decrease in building space (from 610,000 square feet to 390,000 square feet) at Crissy Field (Area B), and, like

the Minimum Management Alternative, evaluates no new construction within the Crissy Field planning district.

Other alternatives capture the range on this issue. Under the Resource Consolidation Alternative, there would be a net decrease in overall square footage within the Crissy Field district (from 610,00 square feet to 540,000 square feet). However, this does not preclude the possibility that some buildings may be removed and a lesser amount of replacement construction built as long as the cap for the district (540,000 square feet) is retained. Other EIS alternatives would allow various amounts of new construction in the Crissy Field (Area B) planning district, subject to quantitative, qualitative, and procedural constraints. See Responses PG-11, PG-12 and PG-14.

Wherry Housing – Some scoping commentors asked that their requested "Revised GMPA Alternative" retain Wherry Housing (at least until 2012) as long as economically practicable and safe and then demolish the units and return the area to open space. The No Action Alternative (GMPA 2000) formulated for analysis in the Draft EIS includes this assumption. This concept came directly from the 1994 GMPA. The scoping Alternative A assumed demolition of Wherry Housing by 2004 when the Army no longer occupied the Presidio. Consistent with the scoping commentors' requests, under the No Action Alternative (GMPA 2000), Wherry Housing would be retained for use throughout the GMPA planning period (i.e., until about 2010) and demolished entirely by 2013. This timing assumption for the No Action Alternative (GMPA 2000) is consistent with the 1994 GMPA, which called for the housing to be removed at the end of the 1994 GMPA planning horizon. See Response EP-14.

All of the alternatives presented in the EIS (except Minimum Management) assumed the demolition of Wherry Housing and the restoration of open space and natural habitat in this area. Other alternatives call for removal of Wherry Housing over a 20 to 30 year period. See Response HO-12.

East and West Washington Housing – Some scoping commentors asked that their requested "Revised GMPA Alternative" retain and use the housing units at East and West Washington within the South Hills planning district until their useful life is over (sometime after 2020), and rehabilitate and reconfigure them if necessary for reuse. The No Action Alternative (GMPA 2000) formulated for analysis in the Draft EIS includes this assumption.

The other alternatives presented in the Draft EIS present an array of treatment options for the East and West Washington housing, including full demolition, partial demolition, retention and conversion into smaller units, and retention and reuse.

The No Action Alternative (GMPA 2000) and Minimum Management Alternative assume the retention and reuse of all of these units; no conversions or reconfigurations are assumed. The Final Plan Alternative assumes the removal of some of the units to achieve open space and natural resource enhancement goals, and the rehabilitation and reconfiguration of remaining units to meet projected housing needs. The Sustainable Community Alternative assumes the retention, and potential conversion, of these units. The Resource Consolidation and Cultural Destination Alternatives assume the removal of all of these housing units to achieve open space and natural habitat restoration goals. See Response HO-13.

Infill – Some scoping commentors asked that their requested "Revised GMPA Alternative" identify areas for potential infill construction. Because PTMP is a general policy document and the EIS is a programmatic level document, none of the alternatives includes specific sites for new construction, as recommended by the commentor.

Rather, specific sites for new construction would be determined in the future through the course of implementation and be subject to further public input and environmental review. Nonetheless, for those alternatives that include the potential for new construction, the following policy parameters were included in and analyzed as part of all PTMP alternatives. They would guide the decision-making process for new construction and permit a general assessment of potential impacts:

- New construction would be allowed only to replace building space that is removed, and would occur only in existing areas of development, consistent with stipulations set forth in the Presidio Trust Act.

- New construction would be designed and sited to be compatible with the historic setting and would be limited to structures of similar size to existing buildings.

- The planning principles and the planning district guidelines set forth the framework for any potential new construction and provide a means to minimize adverse effects upon the NHLD by stipulating that the mass, scale, style, and color of new construction be compatible with the historic setting of the Presidio.

- New construction would be subject to additional analysis and public review prior to implementation, and would be subject to further review under Section 106 of the NHPA, which includes consultation with the SHPO, ACHP, and NPS as stipulated in the Programmatic Agreement.

- The analysis of each alternative assumed a maximum amount of new construction for each planning district. A net difference between existing and future maximum total square footage was given and analyzed.

See also Responses NC-7 and HO-10.

Historic Buildings – Some scoping commentors asked that their requested "Revised GMPA Alternative" rehabilitate and reuse historic buildings to the maximum extent possible/feasible. The No Action Alternative (GMPA 2000) formulated for analysis in the Draft EIS includes this assumption.

With the exception of the Resource Consolidation Alternative, all of the alternatives contained in the Draft EIS do assume that historic buildings would be rehabilitated and reused to the maximum extent feasible. The Resource Consolidation Alternative calls for the demolition, rather than the rehabilitation, of the historic PHSH complex in the southern part of the Presidio. The analysis in the EIS reflects this and has been clarified to indicate that this alternative would adversely affect the NHLD.

All but the Resource Consolidation Alternative in the EIS would protect and preserve the character and integrity of the NHLD. In order to accomplish this objective, historic building rehabilitation would be a critical component of any alternative. Also see Responses HR-1 and HR-5.

PHSH – Some scoping commentors asked that their requested "Revised GMPA Alternative" provide that the Public Health Service Hospital be retained and only the non-historic wings to be demolished.

The No Action Alternative (GMPA 2000) analyzes this specific proposal for the PHSH hospital building. This is consistent with the concept presented in the 1994 GMPA prepared by the NPS. The non-historic addition of the former hospital would be removed to allow restoration of the façade of the historic hospital and reuse of the building.

Other alternatives consider alternate treatments of the PHSH. The Final Plan, Sustainable Community, and Cultural Destination Alternatives also allow for the possibility of (but do not commit to) the removal of the non-historic wings of the former hospital and would allow for replacement construction of that square footage elsewhere within the district. See also to Response PG-5.

Transit and Transportation – Some scoping commentors asked that their requested "Revised GMPA Alternative" make the Presidio a model for urban park transportation planning, and establish a working and reliable system for public transit to and within the Presidio. The No Action Alternative (GMPA 2000) and all other alternatives in the EIS are consistent with concepts contained in the 1994 GMPA with regard to the Presidio becoming a model of sustainability with an environmentally responsible transportation strategy. The No Action Alternative (GMPA 2000) assumes that TDM programs wold be provided by park tenants as described in the 1994 GMPA. See Response TN-1.

Parking Garages – Some scoping commentors asked that their requested "Revised GMPA Alternative" no construction of underground parking garages. None of the alternatives in the EIS include any proposals for construction of underground parking. See Response PK-8.

Tenant Selection –Some scoping commentors asked that their requested "Revised GMPA Alternative" carry forward the concept of "park partners" that was integral to the original GMPA. They also ask that the Trust give preference to tenants who have mission-related or public-benefit business purpose, and use rent subsidies to attract mission-related tenants. The No Action Alternative (GMPA 2000) formulated for analysis in the Draft EIS

carries forward the concepts presented in the 1994 GMPA with regard to tenant selection and a preference for mission-related tenants. "Tenants and residents would work together to create a global center dedicated to addressing the world's critical environmental, social, and cultural challenges." This alternative does not directly use the concept of rent subsidies to attract mission-related tenants, as the Trust is required to seek market-based rents for its leaseable space. Rather, the financial model assumed that a certain amount of square footage would be set at a reduced rent level, equivalent to Class C office space typically occupied by non-profit organizations. More than half of the office space would be dedicated to program-based tenants and leased at rental rates assumed for cultural/educational tenants. Also see Responses TS-1 through TS-9.

Environmental Remediation – Some scoping commentors asked that their requested "Revised GMPA Alternative" specify that the $100 million available for hazardous waste remediation be used for that purpose, rather than for asbestos abatement; include excavation and removal of Landfill E as the highest priority use of remediation funds; and also make Landfill 10 a priority. See Response LU-5.

The environmental remediation program is a separate, ongoing project assumed for all alternatives. Remediation of hazardous substances, pollutants, and contaminants at the Presidio would occur in accordance with the Environmental Remediation Agreement developed among the Trust, NPS, and Army, well before the start of the PTMP process. Specific remedial action plans will address site-specific cleanup issues outside of the PTMP NEPA process, including appropriate remedies and priorities.

Administrative and Operating Expenses, Financing, Competitive Bidding, and Utilities – Some scoping commentors asked that their requested "Revised GMPA Alternative" include other financial and administrative elements. The financial elements, including operating and administrative expenses and third-party financing were fully captured in the analysis of the Draft EIS alternatives by using a planning financial model that was consistently applied across all alternatives to compare their relative revenue generating potential. The model applied consistent assumptions about costs and revenue inputs to generate meaningful comparison of the alternatives. Other requested elements, such as competitive bidding, contracting requirements, and tax credits fell outside the programmatic nature of the EIS analysis and were not, therefore, included in the components of any of the Draft EIS alternatives.

As outlined above, the No Action Alternative (GMPA 2000) adequately captured every element requested by scoping commentors in a manner identical or close to what was requested in their "Revised GMPA Alternative." Furthermore, the Trust has fully captured all requested elements within the range of alternatives analyzed in the Draft EIS and so has met its obligations to consider a reasonable range of alternatives. See also Response EP-6.

AL-5. *Consider the Sierra Club Alternative or Alternative Closely Modeled on It*

A number of commentors request that the Trust evaluate an alternative that they feel was not considered in the Draft EIS, and that would provide a "clear contrast" to the Draft Plan. Typically, the concepts are outlined and/or further refined in their comment letters and include "no new construction" or keeping construction to an absolute minimum, selecting tenants to enhance the GMPA's mission, providing minimal Trust programming, limiting housing to Presidio-based employees and maximizing the amount of housing by subdividing larger units, restoring Crissy Marsh and Tennessee Hollow, and demolishing East and West Washington housing units at the end of their useful life. Some of the concepts noted also call for deeding back open space to the NPS, prohibiting underground parking, minimizing demolition, reducing operating expenses and capital costs, and abandoning the 23-acre Letterman site project as a digital arts campus. Commentors also refer to a specific and detailed proposal developed by the Sierra Club and included in its comment letter, and ask that this proposal, or one closely modeled on it be evaluated in the EIS.

Response AL-5 – The Trust believes that the concepts of the Sierra Club proposal have already been evaluated as part of other alternatives analyzed in the Draft EIS. In response to the requests made by the Sierra Club and other organizations upon their review of the Draft Plan, however, the Trust has included and evaluated in the Final EIS, the detailed proposal presented by these organizations as their preferred plan option. To ensure that the Trust

analyzed what the Sierra Club intended as its plan, Trust staff met with a designated Sierra Club representative to clarify the proposal, and reconciled apparent ambiguities and inconsistencies. The result of this consultation and reconciliation is the Final Plan Variant described in Section 2.1.1 through 2.1.9 of the Final EIS.

The land use concepts of the Sierra Club proposal did not differ markedly from those of the Draft Plan (or from what is now the Final Plan Alternative), with a few key exceptions discussed below. In fact, although the Club referred to its proposal as "the GMPA Revised Plan," the proposal had more land use similarities to the Trust's Final Plan Alternative than it had to the No Action Alternative (GMPA 2000).[2] There were only three key land use concepts that differed in marked degree between the Sierra Club's proposal and the Trust's Final Plan Alternative. First, the Sierra Club proposal called for a more aggressive program of building demolition. In addition to removing all of the square footage called for in the Final Plan Alternative (i.e., non-historic housing units at Wherry, MacArthur, and Quarry), the Club's proposal would demolish an additional 200,000 square feet of building space comprised of all the buildings identified for demolition in the GMPA, which included the Commissary building at Crissy Field (Area B) in addition to historic warehouses at the east end of Mason Street.

The second key land use difference relates to replacement construction. Under the Club's proposal, 1.3 million square feet of existing buildings would be demolished and not replaced, whereas under the Trust's Final Plan Alternative, up to 710,000 square feet of the 1.1 million square feet identified for demolition could be replaced, some (up to about 400,000 square feet) to meet housing needs and some (up to about 300,000 square feet) to provide building additions or annexes to facilitate reuse of historic or other structures for non-residential use or to meet other plan goals. Thus, as in the Final Plan Alternative, housing units removed in other parts of the park would be replaced through subdivision and conversion of existing building space, but the possibility of obtaining any replacement units through new construction or modifying existing space by adding square footage is foreclosed in the Final Plan Variant.[3]

The third key land use difference between the Trust's Final Plan Alternative and the Sierra Club proposal relates to the relative allocation of office uses versus public cultural/educational uses. In the Sierra Club proposal, there would be less cultural/educational building use (660,000 square feet or 14 percent) and proportionately more office use (1.9 million square feet or 40 percent) in comparison to the Final Plan Alternative (920,000 square feet, or 17 percent cultural/educational and 1.82 million square feet or 32 percent office).

These differences in land use also reflect the different policy and management choices between the Sierra Club proposal and Final Plan Alternative related to the overall Presidio vision, tenant selection priorities, and park programming. The Sierra Club proposal encompasses the vision, tenant selection, and programming policy concepts of the No Action Alternative (GMPA 2000), whereas the Final Plan Alternative encompasses the Trust's approach to those management decisions proposed in the Draft Plan as now modified in the Final Plan in response to public comments.

With these key land use and policy differences identified, the Trust was able to analyze the Sierra Club proposal (i.e., the Final Plan Variant) at a comparable level of analysis to the Final Plan Alternative (and all other alternatives). Although many of the Sierra Club's concepts are also included in other alternatives, this approach of constituting the Sierra Club proposal as a variation on the Final Plan Alternative allows an easy and effective side-by-side comparison of the effects of key land use and policy choices between the

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[2] The Sierra Club's "GMPA Revised Plan" proposal is included in the Final EIS and is referred to as the Final Plan Variant.

[3] The Sierra Club's comment letter, while calling for an alternative with "no new construction," also suggested minimal square footage additions to residential buildings if needed to facilitate the division of large units into smaller ones. The Trust chose to reconcile this inconsistency by adhering to the Club's repeated call in the comment letter for no new construction in the Final Plan Variant (just as in the Minimum Management Alternative) because other commentors also requested consideration of such an alternative.

proposal preferred by the Sierra Club and others and the Plan proposed by the Trust.

The inclusion of the Final Plan Variant also satisfies the request of those other commentors who asked the Trust to review a "No New Construction" alternative, defined as "no construction of new buildings, no underground construction, and no expansion of existing buildings – either vertically, horizontally, or underground." The Draft EIS already considered this alternative as the Minimum Management Alternative, but with the addition of the analysis of the Final Plan Variant, these commentors' requests have been more fully addressed. See Response AL-6 below for further discussion.

AL-6. ***Consider a Minimum Development Alternative***

Several commentors assert that the Draft EIS does not include a minimum development plan and that the only alternative with no construction (the Minimum Management Alternative) is insufficient because it is inconsistent with the GMPA and Trust goals.

Response AL-6 – The Trust disagrees with commentors' assertion that the Draft EIS did not include alternatives to evaluate the effects of a "minimal development" plan. In fact, all EIS alternatives could be considered "minimal development" alternatives in the sense that all propose increasing open space in the Presidio and none propose increasing the amount of building space in the Presidio. If the commentors definition of "minimal development" is construed as a reference to the possibility of replacement construction within the constraints of less overall building square footage, the Draft EIS included two alternatives with "minimal" new construction. First, a minimal construction plan was proffered and evaluated in the form of the Minimum Management Alternative. Under this option, there would be little physical change to the Presidio beyond that already underway, no building construction or building removal, and park enhancements would be limited to those needed to meet the Trust Act's legal requirements and other basic legal code requirements. This alternative may not have been the "minimum development" plan that some commentors would have preferred, but it is an alternative that included the concept of no new construction as commentors requested during the scoping period.

To ensure a full range of alternatives, the Draft EIS also evaluated a second form of "minimum development" plan, the No Action Alternative (GMPA 2000). This alternative conforms to the 1994 GMPA as closely as possible taking into account present-day changes and updates. This alternative proposed "minimal development" from a different point of view than the Minimum Management Alternative, that is by reducing the total existing square footage by a larger amount than any other alternative and by proposing little possible replacement construction (170,000 square feet), based on the 1994 GMPA. While the Minimum Management Alternative is not entirely consistent with the GMPA goals, as the commentors who raised this concern noted, the No Action Alternative (GMPA 2000) encompasses the GMPA goals and is therefore a representation of "minimal development" along the lines requested.

The commentors are apparently concerned that the small amount of new construction allowed by the No Action Alternative (GMPA 2000) taints the "minimal development" concept of the alternative. The Trust disagrees. Even the 1994 GMPA, which is held out by many commentors as the appropriate paradigm, allowed some new construction as a management tool in an historic district. In fact, the 1994 GMPA permitted a total of about 220,000 square feet of new construction over time, 170,000 square feet before 2000. The Trust's No Action Alternative (GMPA 2000) is true to the "minimal development" concept in that it assumed new construction only up to the lower end allowed by the 1994 GMPA.

In further response to commentors' requests on this point, the Trust has now also included the Sierra Club proposal, which can be characterized as yet a third form of "minimal development" plan. It would demolish more space than even the No Action Alternative (GMPA 2000) and, like the Minimum Management Alternative, allow no new construction whatsoever.

NEPA does not require that the Trust evaluate every conceivable alternative, only a reasonable range of alternatives. Having analyzed and considered all three of the options described above, the Trust believes that it has fully and adequately addressed commentors' requests to evaluate the "minimal development" concept.

AL-7. ***Consider a Minimal Effects Alternative***

The NPS, CCSF, and others assert that the alternatives analyzed in the Draft EIS have similar impacts. They state that the Trust should modify an alternative to provide a lower potential for effect than those proposed ("one that avoids significant adverse impacts to key resources and the visitor experience"), either similar to or less than the No Action Alternative (GMPA 2000).

Response AL-7 – It is difficult to assess what commentors seek in requesting a "minimal effects" alternative. The request appears to ask the Trust to predetermine the conclusion about environmental effects, and the environmental effects of an alternative cannot be known or predetermined without actually completing the NEPA environmental analysis. The Trust has already captured within the existing range of alternatives those with the potential for "minimal" environmental effects. In reality, there is no such alternative that would have "minimal effects" across the board.

For example, even if the Trust were to create and analyze an alternative that provides for a smaller amount of building square footage than the No Action Alternative (GMPA 2000), at some point – even under the Sierra Club proposal – building demolition in the historic district would include historic structures and would therefore result in adverse impacts on individual historic buildings and eventually impair the integrity of the NHLD.

So even though commentors may believe intuitively that the lowest level of building space at the Presidio will result in the lowest level of effect, that may not be the case. There are so many different and sometimes competing resource values within the Presidio that the result of any given mix of characteristics cannot necessarily be assumed. The alternatives already vary in all the important ways that would likely cause changes in environmental effects, such as the amount and type of open space, total building square footage, level of potential demolition, level of potential new replacement construction, level of resource enhancement, and retention or loss of dwelling units, among others. Some of the alternatives have lesser effects in some areas of analysis than others. In this way, the Trust has created a reasonable array of alternatives that reflect a reasonable range of results across the many different and competing planning variables.

AL-8. ***Consider Other Alternatives***

One individual asks whether the Trust could examine a number of alternatives, including a 1994 Final GMPA Alternative, a GMPA 2000 without LDAC Project Alternative, a GMPA 2000 with LDAC Project Alternative, a Draft Plan without LDAC Project/New Construction/Building Expansion Alternative, a Maximum Non-Historic Planned Demolition plus No New Construction Alternative, and a No New Construction Outside of Existing Structures without LDAC Project and with Maximum Non-Historic Planned Demolition and with Rehabilitation of Remaining Buildings to Meet Federal Code Requirements Alternative. Another individual urges the Trust to consider a Cultural Destination through Adaptive Reuse Alternative that would emphasize "the same museum and cultural uses identified in Alternative D but would accommodate those uses exclusively through the adaptive reuse of existing structures." Another individual suggests "some sort of slower evolving, hybrid alternative" should be pursued over a longer timeframe and with a more gradual funding of programs.

Response AL-8 – All of the alternatives mentioned by commentors have been fully examined, either as part of previous planning and NEPA review documents prepared by the Trust or others or as part of the PTMP planning and environmental review process.

1. 1994 Final GMPA Alternative: The 1994 Final GMPA alternative was fully examined along with other alternatives by the NPS in the Final General Management Plan Amendment Environmental Impact Statement (July 1994). The PTMP Final EIS tiers from the GMPA EIS, and the No Action Alternative (GMPA 2000) in the PTMP Final EIS is the 1994 GMPA alternative updated to reflect current site conditions that have changed since the NPS finalized the GMPA eight years ago. Refer also to Responses EP-14 and EP-2.

2. GMPA 2000 without LDAC Project Alternative: The LDAC project has been the subject of its own planning process and environmental impact statement, and the PTMP EIS tiers from the Letterman Complex Final EIS. See Response EP-16. An important basis for finalizing that project and moving forward with its implementation was the substantial contribution it makes to financial self-sufficiency. In response to this and

other comments that suggest that the LDAC project is unnecessary and undesirable, the Trust evaluated the financial implications of excluding the LDAC project from PTMP alternatives, including the No Action Alternative (GMPA 2000). The financial sensitivity analysis revealed that without LDAC revenues, the No Action Alternative (GMPA 2000) would not be financially self-sufficient or financially sustainable, and therefore this possibility was considered unreasonable and eliminated from further consideration as it fails to meet the threshold financial mandate of the Trust Act. Refer also to Response FI-28.

3. GMPA 2000 with LDAC Project Alternative: The PTMP EIS includes a full analysis of the No Action Alternative (GMPA 2000), which includes all aspects of the LDAC project within its baseline assumptions. Refer also to Responses EP-19 and EP-20.

4. Draft Plan without LDAC Project/New Construction/Building Expansion Alternative: As set forth in Responses EP-16 and EP-18, the Letterman Complex project is final. On the basis of its own Final EIS and Record of Decision, implementation of the project has begun. It is unnecessary and unreasonable to assume anything other than the inclusion of the LDAC project. In response to this and other comments, the Trust analyzed the Final Plan Alternative assuming no LDAC project. The result is a plan that is marginally financially viable. Refer to Response FI-28 for more discussion.

5. No New Construction Alternatives: The Trust has fully satisfied commentors' requests for alternatives that assess no new construction or building expansion. In addition to the Minimum Management Alternative, the Final Plan Variant in the EIS demonstrates potential impacts of the Final Plan if it allowed no new construction, including no building additions or expansions, and other policy changes suggested by the Sierra Club and other commentors. See Response AL-5 above. This Final Plan Variant also fulfills the commentors' request for an alternative that maximizes demolition of non-historic buildings. It retains some non-historic housing, removal of which (without replacement) would make it impossible to meet the competing plan goal stated in the purpose and need for the plan update related to housing Presidio-based employees.

6. Cultural Destination Alternative: The Final Plan Alternative allows for a similar amount of cultural square footage and uses as the Cultural Destination Alternative, but with an emphasis on reusing historic buildings. The Final Plan Alternative does not preclude the possibility of new construction to accommodate this land use, but does not specifically call for new construction to accommodate cultural uses. In response to comments, the Final Plan Alternative has been modified to include a more incremental growth in program funding than originally proposed (i.e. growing from $2 million to $5 million annually over an extended period of time rather than $10 million annually starting within the next few years).

For more information on alternatives, please refer to Responses EP-6, EP-14, and EP-18.

4.6 GENERAL PLANNING (GP)

CONTENTS

General

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GENERAL

GP-1. *Planning Principles*

Several commentors voice concern about the efficacy and function of the Planning Principles; they assert that the principles are too general and open-ended, and should be enforceable as goals and agency commitments for resource protection so that the public can assess whether the Trust is meeting the goals. The NPS requests that the function of the community assurances be explained and that they, together with the Planning Principles and District Guidelines, be adopted as enforceable mitigations. Some commentors suggest that the principles should continue to come from the 1994 GMPA.

Response GP-1 – The substance and much of the text of the Planning Principles originally presented in Chapter Two of the Draft Plan have been retained and moved into Chapter One of the Final Plan. They have been edited for clarity and shortened into a total of 15 planning principles organized into the subject areas of Cultural, Natural, Scenic and Recreational Resources, and Visitor Experience. These principles will guide future actions and decisions by the Trust to ensure the preservation, protection, and enhancement of significant park resources, goals that are consistent with the mission of the Trust as provided in the Presidio Trust Act. The Final Plan also includes explanatory text for each of the planning principles and describes specific examples of actions and programs that demonstrate the implementation of each principle.

The Draft Plan included planning principles in the subject areas of Community, Transportation, Infrastructure and Facilities Maintenance, and Financial Sustainability. These topics have been reorganized in the Final Plan, and the Draft Plan planning principles on these topics have been retained but incorporated into Chapter Two: Park Land Uses, Transportation, and Infrastructure; this chapter expresses the Trust's plan and proposed actions for resident and visitor amenities, housing, access and circulation, infrastructure and maintenance programs. The former Draft Plan planning principles for Financial Sustainability are incorporated within the concepts presented in Chapter Four: Plan Implementation of the Final Plan.

In response to public comment, the planning principles express general policies and goals of the Trust to ensure the long-term protection and preservation of the Presidio's park resources. These goals are necessarily somewhat general because they must guide a wide variety of activities that will be implemented over time. They cannot be read as absolute, enforceable standards because they reflect the many important Presidio resource values that must be protected in balance with one another. In some instances, principles may overlap, come into conflict, or compete for precedence. As the Final Plan explains, "Should principles come into conflict, care will be taken to balance competing values, and to seek overall conformance to the policy framework established by this Plan. The Plan is not intended to be prescriptive; it is meant, instead, to provide parameters and goals that can inform future site-specific plans and program implementation."

As implementation proceeds, the Trust will review projects for consistency with the diverse policy goals in the planning principles. The public will also be able to review and assure that the Trust is meeting these goals in an

appropriate balance through the many public participation opportunities that will accompany the Trust's future planning and implementation projects, both large and small. See Figure 4.3 of the Final Plan.

The Trust can assure commentors, in response to their suggestions, that the planning principles were derived directly from the 1994 GMPA. In some instances, they have been modified or newly written to address Trust management approaches or Trust Act mandates. The planning principles were first presented by the Trust as part of the public scoping for the Draft Plan, and included documentation about their origin (from the GMPA, modified from GMPA, or entirely new). These draft principles were then modified based upon public scoping, and included in the Draft Plan. The principles as they are presented in the Final Plan reflect a refinement based upon additional public input received during the review of the Draft Plan. Some commentors said the principles were too vague; the principles have been edited and shortened for clarity in response to these comments.

The "Community Assurances" presented in the Draft Plan were a summary of proposed plan actions and objectives. As commentors point out, they created confusion about their function and are therefore no longer called out as separate "Community Assurances," but are presented as a summary of plan highlights and goals in the Overview section of the Final Plan.

GP-2. ***Balancing Principles***

The NRDC and the NPS request that the Trust's mandate to protect the Presidio's resources while minimizing costs to the federal government should be clearly articulated in the planning principles and implementation program. In addition, commentors request clarification of how potentially conflicting or competing principles would be balanced in the decision-making process.

Response GP-2 – In response to comments, the Final Plan has strengthened text to emphasize the Trust's mandate, first and foremost, to protect and preserve the Presidio's valuable park resources. This mandate is the guiding principle of the Final Plan, and both the Overview and Chapter One of the Final Plan clearly state so. Text has also been revised to better articulate the Trust's mandate to achieve this goal of park preservation while also generating sufficient revenues by 2013, and beyond, to support operations and maintenance, capital needs, and capital reserves for Area B of the Presidio. In both the Overview and Chapter Four, however, the Final Plan is very clear that reaching a break-even point by 2013 does not equate to achieving the underlying financial base that is needed to ensure the continuing preservation, rehabilitation, and maintenance of the Presidio's historic buildings, landscapes, and natural resources. The Trust's financial requirement cannot be understood apart from the mandate to preserve and protect the park for the long-term. In fact, the PTMP states that the Trust's success will be measured largely by the timely rehabilitation and reuse of the Presidio's historic buildings and landscapes, the quality and quantity of open spaces created and enhanced, and the extent to which the park resources are understood and enjoyed by the public.

Chapter One of the Final Plan includes language addressing the balancing of potentially competing or conflicting planning principles. The planning principles are interrelated and taken together will guide future actions and decision-making by the Trust. However, should conflicts arise through the implementation of site-specific actions, the Trust will strive to balance competing values and seek overall conformance to the policy framework set forth in the Final Plan. When such issues arise, the Trust anticipates conducting additional research, planning, and analysis, and offering opportunities for public input as part of the implementation process . Also refer to Chapter Four of the Final Plan and Response GP-1.

GP-3. ***Plan's Timeframe/Future Changes to the Plan***

Some commentors recommend that the PTMP not cover a 20-year timeframe, but a lesser timeframe. ("[I]s unreasonable when compared to the practices of other federal land management agencies.") The concern is that the Plan will most likely need to be changed during the next 20 years, and this should be acknowledged.

Response GP-3 – It is both common and necessary in a planning and environmental review context to set a reasonable assumption concerning the expected timeframe for "build-out" of a project or program. At a minimum, the assumption serves to set parameters needed for the impacts analysis. There is no legal or fixed standard required for establishing the build-out timeframe assumption. It is a matter of judgment and is specific to each project, plan, or

program. In this instance, the Trust assumed a 20-year build-out period. This assumption is reasonable given the large number and scope of resource improvement projects to be completed to meet the resource protection mandates of the Trust Act. Furthermore, early work with the financial model suggested that cash flow constraints would not allow the Trust to complete all of the necessary preservation and resource capital improvement projects by 2013 (i.e., within roughly 10-12 years), and that assuming a longer period would therefore be more reasonable for financial modeling purposes. For consistency, this modeling assumption was therefore carried through to the impacts analyses topics and also to the Plan itself.

The planning timeframe assumed does not mean the Plan is immutable for the selected period. Changes are determined by need and circumstance, and here too the Plan can and will be changed to address eventualities that arise over time. The very nature of the Plan, including some of its land use flexibility that was not allowed under the 1994 GMPA, was designed with this in mind. The PTMP is a general policy framework for the Trust's management of Area B of the Presidio. As such, it is a blueprint for the future. The programmatic nature of the Plan necessitates that more specific planning be undertaken in the future and that further public input and environmental analysis be completed before many implementation decisions are made. Future implementation activities will build on the PTMP and will address individual sites, planning districts, or areas of the Presidio at a greater level of specificity than is included in PTMP. Amendments to the Plan will be made and adopted by the Board following further planning and environmental review activity and will be subject to public input as required by NEPA and NHPA (refer to Chapter Four of the Final Plan for more details about the types of near-term and long-term implementation actions proposed, the role of public involvement in implementation decisions, and the process for amending and monitoring the Plan.)

GP-4. ***Role of NPS in Implementation***

Two commentors suggest that the PTMP acknowledge the responsibilities of the NPS under the Trust Act and clarify the cooperative effort between the NPS and the Trust relating to these responsibilities. One of the commentors recommends that the NPS provide oversight on all Presidio planning, tenant selection, and programs. Several individuals also remark that the Trust and the NPS are not working as a team. They comment that the relationship between the NPS and the Trust is unclear in the PTIP and the EIS.

Response GP-4 – The PTMP includes text in the Overview, Chapter Four, and Appendix B: Plan Background, that explains the relationship between the Presidio Trust and the NPS. The Presidio Trust Act sets forth the statutory framework for the relationship between the NPS and the Trust. As authorized by Congress, the NPS has jurisdiction over and manages Area A of the Presidio. NPS is responsible "in cooperation with the Trust for providing public interpretive services, visitor orientation, and educational programs on all lands within the Presidio." Beyond this role, the two agencies share the goal of seamless operation and management of the Presidio, cooperate on several joint planning initiatives, and collaborate on natural resources activities, special events and festivals, programs, public safety, and transportation, circulation, and parking issues. In addition, the two agencies have been working together on a Presidio Interpretive Plan for all of the Presidio that will guide interpretive programming and lay the foundation for an effective partnership among the Trust, the NPS, and others for interpretive programs and services.

Plan provisions for coordination with and oversight by the NPS emphasize those areas well-suited to NPS expertise and recognize NPS staffing resource constraints. The NPS role and services it provides with respect to interpretation, visitor orientation, and education are a "floor," not "a ceiling". NPS resources are limited, and the Trust may be able to provide funding and program support to complement the sub-set of Presidio programs provided by the NPS. It is both unrealistic and inefficient to have the NPS oversee all Trust program-related activities. The cooperative efforts between the agencies will be used to enhance the quality and breadth of public programming, not to duplicate efforts.

The Trust is declining to adopt the commentor's suggestion about NPS oversight of Trust tenant selection/leasing decisions. In the GMPA itself, the NPS noted that managing the Presidio would require skills not typically held by NPS personnel, including property management, leasing, real estate finance, and authorities traditionally beyond the reach of NPS enabling

statutes (1994 GMPA, page 112). Congress created the Trust, in part, to bring its leasing and tenant selection expertise to bear. This therefore is an area where NPS coordination and oversight would be both unnecessary and inefficient. See also Responses TS-1 through TS-7.

SPECIFIC FACILITIES AND PROGRAMS

GP-5. *Park Operations and Museum Collections Facilities*

The NPS requests that the PTMP commit to a museum collections facility as well as other operational facility needs in specific buildings for use by both the Trust and the NPS. They note the Trust and NPS have been in ongoing discussions for some time concerning park operational and museum collection facilities needs, and no decisions about the scope of uses, location, or amount of necessary space have been made.

Response GP-5 –The Trust acknowledges that certain facilities are needed to support daily park operations and necessary administrative functions of the Trust and NPS. These operational functions at present include public safety; maintenance; salvage, recycling, and natural resource management including plant nurseries; infrastructure and utilities, such as the water treatment plant and telecommunications facilities; warehouse and storage facilities; and administration. Trust and NPS facilities currently occupy approximately 600,000 square feet. Because these uses do not generate revenue and occupy space that might otherwise be used to serve visitors or the public, every effort will be made to reduce and minimize use of building space for these administrative purposes.

To address park operations needs, the Trust and the NPS are currently collaborating on a Facilities Management Study that will examine current use of space for park operations, identify long-term needs, and assess options for long-term locations with an eye toward overall reduction in occupied space.

Section 2.2.8 of the Final EIS describes the assumptions for all planning alternatives regarding the buildings and facilities necessary for Trust and NPS use for critical park operations. The Final EIS was revised in response to this comment to specifically identify the Presidio Collections Facilities. The EIS financial analysis assumed that approximately 268,000 square feet of space would be occupied by the Trust and NPS as non-revenue generating space.

The decision-making framework for museum collections facilities needs is set out in the Final Plan, Planning Principle 5, under Collection Management. Text explaining this principle acknowledges the current Park Archives and Records Center in Presidio Building 667 and commits to the continuing function, though the location and scale may change in the future. The Trust agrees with the NPS that the agencies must comply with the federal collections requirements in 36 CFR Part 79; these regulations do not require the Trust to identify the size, physical requirements, or location of such a facility in the PTMP, however. The Trust will cooperate with the NPS to study the need for, feasibility, and location of an enhanced park-wide collection management facility, and has taken the first step by including this assessment within the Facilities Management Study currently underway.

GP-6. *Trails*

BCDC requests that the Final Plan include figures depicting both existing and proposed trails and that the Trust provide more locations for additional pedestrian and bicycle linkages to the shoreline. BCDC also requests that the PTMP include guidance to indicate the types and attributes (e.g., widths, signs, furniture, landscaping, lighting) of trails contemplated for the Presidio.

Response GP-6 – In response to the first request, two new figures have been added to Chapter Two of the Final Plan showing two separate draft trails plan maps, one for pedestrian routes and one for bicycle routes. These figures represent a working draft version of the Trails and Bikeways Master Plan. The NPS and Trust are working cooperatively to prepare a draft Master Plan and corresponding Environmental Assessment that address Presidio-wide trail and bikeway networks. These draft documents will be released for public review and comment later this year. The final trail and bikeway alignments will be determined through the ongoing planning and environmental review process.

Regarding additional pedestrian and bicycle linkages to the shoreline, the draft pedestrian routes map are now included in the Final Plan. As BCDC notes, trail connections between the Main Post and Crissy Field would be provided at the west side of the parade ground (this is proposed as a primary trail route),

along Halleck Street, and along Tennessee Hollow. Additional linkage from the interior to the shoreline would be provided along McDowell Avenue, where there would be a pedestrian connection to Crissy Field from the stables and Presidio uplands. See Figures 2.7 and 2.8 in the Final Plan.

More detailed information on trails, including approximate widths, signage, and other design parameters, will be made available in the forthcoming Draft Presidio Trails and Bikeways Master Plan. The Draft Master Plan will examine alternatives that include trails for pedestrian, bicycle, and multi-modal trails. While the PTMP is a programmatic document and cannot provide this level of detail, it contains policy guidance consistent with the Draft Presidio Trails and Bikeways Master Plan for providing increased access for park visitors in balance with resource preservation and enhancement objectives.

GP-7. ***Sustainability***

Commentors urge the Trust to commit to sustainability and describe how the Presidio would be a model of environmental sustainability. They ask the Trust to describe more fully the role of stewardship in planning for the Presidio's future.

Response GP-7 – The concepts of preservation, sustainability, and education permeate the Trust's operations and management of Area B of the Presidio and are clearly articulated in the Final Plan. Specifically, please refer to Chapter One's section on Bringing People to the Park, and Chapter Two's sections on Cultural and Educational Uses, Transportation, and Infrastructure and Facilities, which give specific examples in these subject areas. The Plan describes both current and proposed programs and practices, the concepts for which come from the 1994 GMPA. Examples of programs implemented or underway include the development of an on-site water recycling system located within an existing Presidio building to serve Presidio needs, cost-effective energy conservation retrofits of buildings and infrastructure systems, use of clean-fuel shuttle buses, and solid waste reduction programs that include educational and job training components. The PTMP also calls for expansion of current stewardship programs, in collaboration with the NPS and other partners, and outreach to under-served communities. As articulated in the Final Plan, the Trust will continue to build partnerships to increase participation in sustainability initiatives and is committed to making these programs accessible to as many visitors as possible.

GP-8. ***Open Space***

Commentors suggest that the Trust should place its land use priorities on open space, outdoor recreation, education, and environmental programs. The GGNRA Citizens' Advisory Commission suggests that, where active recreational sites are in conflict with natural area restoration, the recreational site should be relocated if feasible.

Response GP-8 – The Final Plan makes a clear, strong commitment to an increase in open space, as well as to improving open spaces for outdoor activities and play and enhancing existing recreational facilities and play opportunities in balance with resource protection. As described in Chapter Two of the Final Plan, the Trust will increase open space by 99 acres over time, which will afford many more opportunities for natural habitat restoration and increased visitor use and enjoyment. Please refer to text in Chapter One, Scenic and Recreational Resources, about the Trust's proposal to increase and diversify recreational opportunities through the creation of new open space in balance with resource protection.

The Plan makes a commitment for the Trust to retain and improve existing recreational facilities as well as open spaces used for passive recreation. The Trust recognizes that active recreational uses and facilities have the potential to conflict with open space managed for the restoration of natural habitats. Proposals for specific recreational facilities and sites are not included in the Final Plan, as it is a programmatic level document. However, it is anticipated that proposals may be developed to remove or relocate some recreational facilities in the future in conjunction with other planning projects, including environmental remediation plans. The relocation of facilities, including ballfields, would be done in balance with other resource management goals and objectives, and these undertakings would include opportunities for public involvement. Please refer to Chapter One, Planning Principle 10, in the Final Plan.

GP-9. ***Providing for the Arts***

Several commentors request that the PTMP include more information about potential facilities for the arts and ensure their presence in the Presidio's future.

Response GP-9 – The PTMP is a programmatic level document that sets forth a framework for the Presidio's future management. As such, it does not provide building- or site-specific treatment recommendations. However, the PTMP does include broad categories of building uses, with overall square footages by use and preferences for land uses by planning district. The PTMP does not exclude the possibility of facilities for the arts as part of the cultural and educational uses described in Chapter Two of the Final Plan. The Final Plan allocates up to 920,000 square feet of space for cultural and educational uses that may include visitor facilities, interpretive sites, performing arts facilities, non-commercial theaters, museums, space for arts and educational organizations, schools, institutes, training facilities, libraries, archives, and classrooms. Many of these uses may not be able to fully fund themselves. Therefore, successful installation of these uses within the Presidio may require financial assistance from other Trust projects or outside funding sources.

4.7 PLANNING DISTRICT CONCEPTS AND GUIDELINES (PG)

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GENERAL

PG-1. *Design Guidelines*

The National Trust for Historic Preservation and others recommend that the Trust commit to specific, detailed and quantifiable design guidelines in its plan (e.g., building height, density, site design, building separation, architectural form and articulation, relationship to historic buildings) for each planning district to provide useful guidance on specific mitigation measures or design and construction specifications and to ensure new construction is compatible with the historic district. One commentor notes that the height limit in the Draft Plan is inconsistent with the assumption used in the Draft EIS and expresses concern that there is a "blanket height limit" in the Draft Plan.

Response PG-1 – Planning guidelines, developed to reflect and be consistent with the Secretary of the Interior's Standards for the Rehabilitation of Historic Properties (NPS, 1992) are set forth in Chapter Three of the Final Plan. The planning guidelines will be used to guide future changes and designs within each planning district. These guidelines identify the key character-defining features of each district and provide guidance for preserving, protecting and enhancing these features. For each planning district, a maximum level of potential demolition and new construction is provided, and maximum building heights are also included based upon an understanding of the district's built character. In response to one commentor who expresses concern that there is a "blanket height limit" in the Draft Plan, each planning district includes specific height limits based upon an understanding of the character-defining features of that district. The inconsistency with the Draft EIS, with regard to building height restrictions, has been remedied and the PTMP planning guidelines would apply to all of the alternatives except the Minimum Management Alternative.

The Trust cannot commit to the preparation of more detailed design guidelines for each planning district, although in many cases, more specific planning will include the preparation of such guidelines. It is difficult to predict the precise scope or content of future planning efforts at this time; some projects (whether at the district level or project-specific) will require the preparation of design guidelines to supplement the planning guidelines included in Chapter Three of the Final Plan, and some will not. The necessity for detailed design guidelines will be determined on a case by case basis. Any future design guidelines prepared would not include directions for building specifications and construction details, as suggested by one commentor. Design guidelines, sometimes known as "compatibility criteria," are intended to provide guidance to the designers to ensure that new elements (buildings, landscape features) will be compatible with the historic setting. The planning guidelines provided in the Final Plan are the beginnings of this design direction; more specific site-design criteria and guidance may be developed as part of a specific project proposal. In particular, for new construction proposals, site evaluations will assess building height, site design, building separation, architectural form, and articulation in relation to adjacent historic development patterns. It would be at this point in the design process that specific and quantifiable information and guidance would be provided, as needed to ensure compatibility with the NHLD. Other projects may not require design guidelines; such projects would include historic building and landscape rehabilitation, which will be guided by physical history reports, cultural landscape assessments, and the Secretary's Standards (for both buildings and historic landscapes).

The PTMP is a programmatic level document and does not specify individual site treatments, including new construction. Rather, it provides a framework and guidance for future decision-making. The Final Plan does commit to a process for both public involvement in compliance with NEPA and NHPA as well as for historic compliance consultation to help ensure protection of the NHLD. Refer to Responses PI-1, PI-2 and PI-10 for additional information on this subject. The Final Plan also states that new construction will only occur in areas of existing development and be sited to minimize impacts on adjacent resources. New construction will be used to reinforce historic character-defining features of an area and its design will ensure that the association, feeling, and setting of the significant elements and the integrity of the NHLD are protected. The public will have opportunities for review and input during the planning process for these types of projects. In response to public comment, Chapter Four of the Final Plan was refined to clarify future opportunities for public participation. In addition, the ACHP, SHPO, NPS and concurring parties to the Programmatic Agreement will also have opportunities for review and consultation on undertakings which could have a significant adverse effect on historic resources. See Final EIS, Appendix D.

The Guidelines for Rehabilitating Buildings at the Presidio of San Francisco (NPS, 1995), will also be followed.

PG-2. ***New Construction at Crissy Field and Fort Scott***

The BCDC suggests that the Trust assure the design of newly added square footage at Crissy Field and Fort Scott does not result in visual or physical barriers to the Bay, in adverse impacts on sensitive Bay-related habitats or species or on recreational uses of the Bay shoreline.

Response PG-2 – Developed acres of the Presidio under Trust jurisdiction (Area B) lie some distance from the shoreline, which remains in NPS jurisdiction. In general, existing (and therefore any potential future) buildings are sited at the top or at the base of coastal bluffs. Site topography, more than any manmade features, tends to dictate access between inland and coastal areas.

The PTMP sets outer bounds on future actions that will involve changes in square footage. No changes are currently contemplated that will increase square footage or result in visual/physical barriers to the Bay, adverse impacts on Bay related habitat or species, or recreational use of the shoreline. In response to comments regarding development at Crissy Field, the Final Plan decreases the maximum amount of potential new construction that will be permitted at Crissy Field by approximately 55,000 square feet as compared to what had been proposed in the Draft Plan. The net future change at Crissy Field will allow only up to 30,000 square feet more than what currently exists. Most of the potential square footage increase at Fort Scott is intended to accommodate replacement of non-historic housing with more compatible and diversified housing. This non-historic housing is located within a single enclave that is visually and physically separated from the rest of the planning district and the Bay.

If and when specific projects are proposed that will increase square footage at either Crissy Field or Fort Scott, they will be subject to further public review and additional environmental analysis. Furthermore, under the Final Plan, any new construction must be consistent with PTMP planning principles for resource conservation and protection as well as the planning guidelines set forth for each district, which are designed in part to avoid visual and physical barriers to the Bay. Conformance with PTMP planning principles and planning guidelines will ensure that any new square footage would not adversely affect enjoyment of the Bay and its shoreline within Area A or within areas adjacent to the Bay or shoreline (Area B).

PG-3. ***Use of Quotations from GMPA***

The Neighborhood Association for Presidio Planning asks the Trust to clarify whether the italicized quotations from the 1994 GMPA in the Draft Plan indicate a specific commitment that those portions of the GMPA would be carried out in the future.

Response PG-3 – The technique of directly quoting in the Draft Plan some, but not other, text from the original GMPA caused confusion among reviewers regarding whether the Trust would follow exactly the 1994 GMPA. In response to this and other comments, the majority of quotations from the GMPA have been deleted in the Final Plan and, instead, the concepts embedded within these quotations have been incorporated into the full body of the Final Plan text, as applicable. This change indicates that, although many of the policy, land use, and planning concepts of the GMPA have been carried forward into the PTMP, the Trust will carry out these concepts consistent with the updated implementation strategies under the Final Plan. Also refer to Response PN-4.

PUBLIC HEALTH SERVICE HOSPITAL DISTRICT

PG-4. ***Need for Specificity within the PHSH District***

The Planning Association for the Richmond and one individual request more specificity for the PHSH district. One commentor indicates that the PHSH section is the weakest part of the planning document because there is no specific or credible plan for this district. Because this district is separate from the main Presidio with entrances from a city neighborhood, any plan would need to address these specific issues.

Response PG-4 – The land use preferences given for each planning district are expressed in terms of a general mix of uses and are long-term goals. In the case of the PHSH district, the Trust has strengthened language in the Final

Plan to state that the preferred use of the former hospital is residential, with the possibility of educational uses as well. However, as is the case with all of the planning districts, the Trust will seek viable tenants for these preferred uses but implementation will inevitably depend upon the cost of building rehabilitation, the ability to interest potential tenants, and other factors. With regard to access and circulation, the Final Plan indicates that 14th and 15th Avenues will provide the main vehicular access between the site and the City, with Battery Caulfield Road providing access to the rest of the Presidio. The Trust anticipates that once a proposal is made for reuse of the district, or portions thereof, additional site planning and design would occur. Issues around access and circulation would be further addressed at that time, allowing for public participation.

PG-5. ***Demolition vs. Reuse of the PHSH***

Commentors offer a wide variety of viewpoints concerning the Public Health Service Hospital. The Lake Street Residents Association and various individuals recommend that the Plan call for the demolition of the PHSH building, while the National Trust and others recommend that the PTMP contain a much stronger commitment to retaining historic sections of the PHSH and consider demolition only as a last resort. UCSF notes that a previous engineering study raised doubts about whether the historic portions of the building could be rehabilitated cost-effectively. The Lake Street Residents Association, Neighborhood Associations for Presidio Planning, and others recommend that the PHSH building footprint be reduced in size by removing the building "wings."

Response PG-5 – The range of suggestions for the PHSH district, and the PHSH building itself, are reflected in the range of alternatives included in the EIS. One alternative, the Resource Consolidation Alternative, would remove the entire hospital complex, while others would preserve it. Some alternatives would remove the non-historic wings of the hospital building, and others would leave this decision to be resolved by further study. A range of residential, conference, and educational land uses are also assessed.

The Final Plan permits future consideration of a number of different building uses and treatments. Consistent with the Trust's commitment to preserve and protect the integrity of the NHLD, the Final Plan states that the Trust will first pursue the rehabilitation and reuse of the historic portions of the former hospital (Building 1801). Future planning may consider removal of the non-historic wings of the main hospital building, which would allow for the rehabilitation of the building's original façade. Any replacement construction would be carefully sited and designed to be compatible with the cultural landscape. If, however, a suitable tenant cannot be found to rehabilitate the historic hospital, the entire building may be considered for removal; removal of the historic hospital and replacement construction would be considered as part of a separate undertaking. See Chapter Four of the Final Plan. The maximum permitted building area for this district is 400,000 square feet (the amount of currently existing square feet), with the maximum amount of demolition and new construction at 130,000 square feet. As provided in the Final Plan, these are overall caps for the district and the final site plan could consider a reduced building area.

PG-6. ***Housing as Priority Use within the PHSH District***

One neighborhood group states that the potential uses for the PHSH allowed in the Draft Plan are too varied and should be narrowed. Various civic, neighborhood, and environmental organizations, as well as various individuals, recommend that, to avoid impacts on adjacent neighborhoods and to place residents close to neighborhood services and transit, the Final Plan identify housing as the top priority use within the PHSH planning district. UCSF has expressed interest in developing student housing opportunities in the PHSH district, and suggests specifying the number of units that could be developed. Others suggest that if the main building cannot be reconfigured for housing, it could be replaced with some new housing.

Response PG-6 – In response to suggestions both to narrow potential uses and to identify priority uses, the Final Plan states a preference not previously identified in the Draft Plan for residential uses within the PHSH district, and also allows for educational uses. With regard to the request for reuse as housing, Chapter Two of the PTMP provides more detailed information on the Trust's goals for housing than what was presented in the Draft Plan. Specifically for the PHSH district, the Final Plan proposes to increase the number of residential accommodations and to convert the historic hospital to residential use, if feasible.

The Final Plan is also responsive to the suggestion to indicate for the PHSH district (as well as other districts) the number of dwelling units that could be considered. A range of dwelling and dorm units for the PHSH district is provided in Chapter Two, under the Housing section, as follows:

Total existing dwelling/dorm units = 97. (Some are being used for non-residential uses on an interim basis.)

- Dwelling/dorm units to be removed or converted to non-residential use = 0-90
- Dwelling/dorm units to be replaced within existing buildings = 80-200
- Dwelling/dorm units to be replaced within new construction = 0-40
- Maximum number of residences = 200-210

These ranges assume that interim non-residential uses within the nurses dormitories may or may not be perpetuated, and that the number of units provided by converting the hospital building to residential use will require further building-specific studies.

PG-7. ***PHSH Parking Lot and Nike Missile Site***

Various federal and local agencies, civic/neighborhood and environmental organizations, and individuals note an apparent inconsistency between the Draft Plan and the Draft EIS within the PHSH district. The Draft EIS suggests that the Nike Missile site (upper plateau) be used for institutional/residential uses, and the PHSH parking area (upper plateau) be used for landscape vegetation. The Draft Plan, on the other hand, proposes general planning guidelines for enhancing open space on the upper plateau and allowing building or other developed uses on the lower plateau. Several agencies, organizations, and individuals recommend habitat preservation in the PHSH and Nike Missile site areas. A few commentors object to treating the former Nike Missile site as a potential area for developed use.

Response PG-7 – The land use inconsistency at the PHSH upper plateau parking area identified by commentors has been corrected in the Final Plan and Final EIS in response to these comments. First, in the Final Plan graphics for the PHSH district, the upper and lower plateaus, as well as the Nike swale, are identified. The Final Plan's district concept states the intent to maintain the historic concentration of development on the lower plateau and enhance open space on the upper plateau. The planning guidelines clarify that the open space below the Nike Missile site will be rehabilitated and restored as native plant habitat. To help clarify this, within the Final Plan's district concept graphic, the parking lot feature north of the PHSH (upper plateau) has been revised to indicate the use of the lot for native plant communities, as shown in Figure 3.6, consistent with the VMP zoning. The text in the Final EIS has been corrected to reflect this change in open space.

It should be noted, however, that there is a cluster of historic buildings at the north end of the planning district above the Nike Swale, and this area is identified and shaded as a generalized area of development. This site has been previously disturbed and developed, and is therefore an appropriate site for future development. Despite a few opposing views, the Final Plan allows for the potential that some replacement construction or other developed use (e.g., playing fields) could be proposed for this area in the future, if sited and designed in a manner compatible with the historic district and so as not to adversely affect the adjacent natural resources. The analysis of impacts that could result from institutional/residential uses at the Nike Missile site, north of the existing wetland, is included in the Final EIS as it was in the Draft EIS, and more detailed analysis would be provided during future site-specific planning efforts. Future site specific planning would also evaluate the extent to which existing wetland features might be expanded. See also Response WR-7 for further clarification of these issues.

Lastly, with regard to the interface between the golf course's edges and the northern edges of the PHSH district, a Golf Course Habitat and Wildlife Management Plan, which will identify management actions to promote linkages between ecological systems and maximize natural resource values, will be prepared and implemented. This will include the edges around the golf course that abut forested, native plant, and landscaped areas. The Trust recognizes the importance of protecting and enhancing small isolated native vestiges scattered throughout the Presidio, which could serve as significant habitat for key pollinators, promote supporting important linkages for gene

flow, and connect important ecological islands within larger corridors. The Final Plan will ensure further protection of these remnant patches by managing them, to the greatest extent feasible, consistently with the VMP native plant community zone objectives. See also Response OS- 1 for further discussion on these issues.

PG-8. ***Historic Preservation and Interpretation: Nike Missile Site and Historic Cemetery***

The Fort Point and Presidio Historical Association and the California Heritage Council recommend that the Trust commit to historic preservation and interpretation of the Nike Missile site at the PHSH. The USFWS makes a similar recommendation for the historic cemetery within the PHSH district.

Response PG-8 – The Nike Missile site, otherwise known as Battery Caulfield, was constructed in 1955 and was operational until 1964. It is not a contributing feature of the Presidio's NHLD. In 1999, the U.S. Department of the Army, Corps of Engineers cleaned up wastes at the site as part of the environmental remediation program. At that time, all of the machinery was dismantled, and hydraulic fluid, equipment and other materials from missile magazines at the site were removed. See Nike Missile Facility Hydraulic Fluid Removal Report, April 1999, found in the Trust's library. The cleanup was done in consultation with the Presidio Trust and the NPS. It was determined that, since an intact Nike Missile site is in the Marin Headlands of the GGNRA and is preserved for purposes of interpretation, Battery Caulfield should be dismantled.

With regard to the former Marine Cemetery, the Final Plan has been amended, in the PHSH planning guidelines, to include a guideline specific to the protection and commemoration of the cemetery.

PG-9. ***Land Use Policies***

The Sierra Club requests that the Trust address the extent of the PTMP's commitment to the following policies of the original GMPA for the PHSH district: demolishing the hospital wings, allowing residential use for Presidio-based employees (with second priority use as an environmental studies school), preserving sensitive habitat consistent with the VMP, and limiting cultural and educational space to the PHSH district (along with Fort Scott and the Main Post).

Response PG-9 – The PTMP is consistent with all of the recommendations from the GMPA made by the Sierra Club for the PHSH district. The Final Plan recommends the demolition of the non-historic wings to allow for the rehabilitation of the historic hospital building, with the potential for replacement construction elsewhere within the previously developed areas of the district. The Plan's preferred land uses for the district are residential and/or educational, as in the GMPA. The sensitive natural habitat in the area will be protected and enhanced, in accordance with the VMP. Furthermore, the Trust's planning concepts and planning guidelines for this district are derived from and based primarily on those in the GMPA.

CRISSY FIELD (AREA B) DISTRICT

PG-10. ***Integration of Areas A and B***

The CCSF Planning Department, the Evelyn & Walter Haas Jr. Fund, and various individuals recommend that the Trust integrate the landscaping and design, development and use of Crissy Field (Area B) with Crissy Field (Area A).

Response PG-10 – The Trust agrees with the recommendation that planning and design for Crissy Field (Area B) be respectful to and carefully integrated with the Area A portion of Crissy Field. The planning district concept for Crissy Field (Area B) in the Final Plan states that "the Presidio Trust will work in cooperation with the National Park Service to ensure that the successful improvements made to Area A are carefully considered and complemented by activities and changes within Area B." Through future planning and site designs, the Trust will carefully consider design decisions for landscaping, circulation, parking, as well as land and building uses with regard to their compatibility with Area A.

PG-11. ***Existing Buildings at Crissy Field (Area A)***

Various organizations and individuals indicate that the PTMP should retain existing buildings at Crissy Field for reuse, mainly for cultural/educational

(museum) uses. Other individuals believe that the non-historic PX, Commissary, parking lots, and outbuildings should be removed for marsh expansion.

Response PG-11 – In response to comments, the planning concept for Crissy Field (Area B) in the Final Plan provides more specifics about land and building use preferences than were included in the Draft Plan. The Final Plan states that the net difference in total square footage for this district would be an increase of 30,000 square feet over the current square footage, and that the maximum demolition that could occur is 40,000 square feet. Therefore, the Plan assumes that the majority of buildings at Crissy Field would be reused. Preferred land uses are cultural facilities and educational programs. The Final Plan also states that reuse of the Commissary as museum space will be preferred, but if that is not possible, an alternate museum location might be the historic hangars along West Crissy Field. Building 640 at Crissy Field (Area B) is also called out for preferred use as a museum/interpretive site. The Final Plan allows some lodging as an appropriate use within the Crissy Field (Area B) district, and envisions lodging at historic Stilwell Hall and possibly adjacent buildings. Other Crissy Field (Area B) facilities would offer recreational activities and other public uses to serve visitor needs.

In response to comments about the Crissy Marsh, the Final Plan states the Trust's commitment to the long-term ecological health and viability of Crissy Marsh, and references the agreement between the Trust, the NPS, and the GGNPA to study options for the marsh's health. See Final Plan, Appendix C. Although the Final Plan does not commit to the demolition of non-historic buildings and the removal of pavement to expand the marsh, in response to comments, the Final Plan makes a commitment to forego actions that might preclude marsh expansion for a reasonable period. For up to two years, while the study for the marsh is underway, no long-term leasing or new construction will be allowed in the area east of the Commissary parking lot to the west edge of the historic Mason Street warehouses.

PG-12. ***Amount of Development along Crissy Field***

The NPS and other organizations, as well as various individuals, indicate that the Trust should foreclose new construction and new visitor facilities and significantly limit development and activity at Crissy Field (Area B) to avoid changing the character of the district, negatively affecting the visitor experience, or duplicating commercial services just outside the Presidio, and to be more compatible with the Crissy Field (Area A) restoration goals. According to the NPS, the Draft Plan proposal to allow 80,000 square feet more than presently exists and 300,000 square feet more than the GMPA "has the potential to change the Presidio's northern waterfront from an area of respite from urban pressures to an extension of the City itself… The NPS recommends that the level of development in the Crissy Planning District be significantly lowered from the level in [the Draft Plan]…." The BCDC indicates that any new development should avoid affecting the recreational and natural resources along the Bay in Area A and the positive experience of visitors who come to Crissy Field for enjoyment. BCDC is "specifically concerned that the proposed uses in Area B…may generate such a high increase in car traffic and attendance that they may negatively affect the experience of Crissy Field visitors who come to experience its quiet beauty."

Response PG-12 – The Final Plan has been amended in response to concerns expressed about the level of development and activity proposed for the Crissy Field district in the Draft Plan. In the Final Plan, the maximum amount of new construction within the district is 70,000 square feet and would only occur in previously developed areas and would be built to principally facilitate rehabilitation and reuse of historic structures. The maximum allowable total building area for the district in the Final Plan is 640,000 square feet, which is 30,000 more square feet than exists today; in other words, a maximum increase of less than five percent in square footage. Compared to the Draft Plan, this change will lower the intensity of potential uses at Crissy Field. New construction would be sited to minimize impacts on adjacent resources and its design will ensure that the association, feeling, and setting of the significant elements of Crissy Field and the integrity of the NHLD are protected. The Final Plan also provides more specificity regarding land uses at Crissy Field by stating "preferences" for museum use at the Commissary and Building 640, and for rehabilitation of Stilwell Hall and possibly adjacent buildings for small-scale lodging.

In response to comments, the Final Plan makes a stronger commitment to "sensitive site enhancements" and resource protection at Crissy Field. Any future proposed changes will have to be in conformance with the planning

principles and planning guidelines of the Final Plan. Future planning for Crissy Field would be done in cooperation with the NPS to ensure that the improvements already made in Area A are complemented by activities and enhancements made in Area B, and that park and shoreline resources are protected. Major changes proposed, if any, such as demolition and new construction, will be subject to additional planning, design, and analysis with public input prior to implementation.

The Final Plan reflects the Trust's belief that reuse of historic buildings along Crissy Field can be served by installing appropriate visitor-serving uses (cultural programs, some lodging, recreational, and/or visitor amenities). The Trust believes that museums, lodging, cafes, or other cultural facilities are appropriate land uses at Crissy Field and would be consistent with the Bay Plan's Recreation Policy 1.g. which encourages in urban areas adjacent to the Bay "water-oriented commercial-recreational establishments, such as restaurants, specialty shops, theaters and amusements." These uses would also be consistent with the vibrant and successful Crissy Field project in Area A, which attracts thousands of visitors on a daily basis.

PG-13. ***Dragonfly Creek***

One individual recommends including the entire length of Dragonfly Creek in the Crissy Field (Area B) district to explore ways of restoring the entire riparian corridor.

Response PG-13 – Dragonfly Creek, a remnant natural system which exists primarily within the Fort Scott district as a riparian corridor, is shown in the Final Plan's Figure 1.6, Wetlands and Stream Drainages, and described in Chapter One. The Final Plan calls for studying possibilities for restoring riparian scrub and oak riparian forest along its banks. The Fort Scott planning district concept calls for the preservation and enhancement of the creek. As part of this future creek enhancement project, options for its connection into the Stables and Crissy Field may be explored.

PG-14. ***Land Use Policies for Crissy Field (Area B)***

The Sierra Club and others request that the Trust address the extent of the PTMP's commitment to the following policies of the GMPA for the Crissy Field (Area B) district: expanding the marsh; extending Tennessee Hollow restoration to the marsh (and providing sufficient funding for each project); ensuring that Doyle Drive reconstruction allows both projects; demolishing historic Warehouses 1183-86, the PX and Commissary; prohibiting lodging; limiting museums to existing structures and to themes of aviation and bay ecology; allowing an environmentally-focused school at Stilwell Hall, use of the stables by the U.S. Park Police, and an NPS-run ecology lab.

Response PG-14 – The Final Plan addresses and is consistent with most of these GMPA-derived recommendations or requests for additional information. Chapter One of the Final Plan expresses a commitment to the long-term ecological viability and health of Crissy Marsh. The GMPA called for the expansion of Crissy Marsh to 30 acres, but it did not identify how to accomplish the goal. The Final Plan describes the recent agreement among the Trust, NPS, and the GGNPA to study an array of options for achieving the health of the marsh including the potential for its expansion into areas that were once tidal marsh. Chapter One, in the same section, also states the goal to restore Tennessee Hollow and to reestablish its connection to Crissy Marsh, the same goal provided by the GMPA. With regard to the comment about sufficient funding for these projects, like any others, the implementation of Tennessee Hollow's restoration or of the Crissy Marsh project will be contingent upon the Trust's success in generating sufficient revenue in the future to cover operating expenses as well as park enhancement projects such as these. As for funding of Crissy Marsh's health, the Final Plan does not presuppose funding sources, which can be better determined once the outcome of the study of options is completed and the scope of what must be implemented is fully understood. The Trust is committed to these projects, but both projects are anticipated to be costly, and the Trust will look towards building partnerships to pursue project implementation and funding options including grants and philanthropy.

The lead agency with final authority to decide the outcome of the Doyle Drive reconstruction process is the San Francisco County Transportation Authority. While the Trust expects to remain active in its planning and outcome, the Trust cannot definitively ensure the final result. The Trust will review and evaluate proposals for Doyle Drive reconstruction, determine their compatibility with protection of park resources and values, including

Tennessee Hollow and Crissy Marsh, and provide input to SFCTA to influence the Doyle Drive project's consistency with the PTMP.

The comment suggests that Buildings 1183 through 1186, which are contributing structures to the NHLD, were to be demolished under the 1994 GMPA, but they were not. With only a few notable exceptions (e.g., the Commissary), the Final Plan does not propose building-specific treatments, but generally commits to rehabilitation of historic buildings to the greatest extent feasible before considering their demolition. Refer to Responses HR-4, HR-5 and HR-6 for additional information on this subject. With regard to the PX and the Commissary, which were both to be demolished under the GMPA, in the Final Plan the Commissary is identified as a priority facility for a museum use, and a specific treatment for the PX is not yet proposed. Instead, the PX is included in the Crissy Marsh Study Area in which no long-term leasing or new construction will be allowed for the next two years (the estimated duration of the Crissy Marsh Study).

Unlike the GMPA, lodging is considered in the PTMP as an appropriate use within the Crissy Field (Area B) district, and Stilwell Hall is called out as a preferred location and historic building reuse opportunity for this use. The Final Plan allows consideration of some additional square footage within the Crissy Field (Area B) district if a building addition or annex is desirable adjacent to Stilwell Hall to make its rehabilitation and reuse viable. Like the GMPA, the PTMP favors museum use at Crissy Field (i.e., included under the general category of cultural uses). Specifically, preferences for museum locations at Crissy Field are the Commissary and Building 640. If reuse of the Commissary were not possible, an alternate location for a museum use would be the former hangars at the west end of Crissy Field (Area B). Unlike the GMPA, the PTMP does not specify the subject matter of the museum programs because these decisions are highly contingent on interest, availability, program partnering opportunities, and outside funding, all of which are unknown. As a result of Congressional directives, two feasibility studies are currently underway: one for a Pacific Coast Immigration Museum (potentially within the Commissary) and another regarding Building 640. See Chapter Two of Final Plan. Where the GMPA called specifically for the creation of an aviation museum at Crissy Field, the PTMP is more open-ended and provides that the important historic events and associations of Crissy Field's aviation history will be interpreted, but the specifics for this will be determined in the future, in coordination with the NPS. Establishment of an aviation museum would require a substantial commitment of funds by an agency or organization other than the Trust.

Similar to the GMPA, educational uses are also compatible under the PTMP within the Crissy Field district. Although the commentor recommends this use specifically for Stilwell Hall (as an environmentally-focused school) the continued presence of the Crissy Center in Building 603 along Crissy Field (Area B) will ensure a similar use and perhaps be a catalyst for other environmental education programs tied to the Bay's ecology. Consistent with the commentor's recommendations, preferred uses at the stables area will be educational and cultural and the current U.S. Park Police Mounted Patrol will remain in its current location here.

MAIN POST DISTRICT

PG-15. ***Strengthening the Role of the Main Post***

The NPS and two individuals recommend that the Trust strengthen the role of the Main Post as a significant visitor area. ("[T]he Main Post's southwest corner…with its theater and two museum spaces, offers great potential as a high public use area.") The NPS notes that the Draft Plan shifts the majority of cultural and community programs from the Main Post to Crissy Field, and urges the Trust to reconsider this approach out of concern with undesirable impacts on Crissy Field (Area A). The NPS encourages the Trust to provide, as did the GMPA, that Main Post buildings would be leased for publicly accessible visitor-serving uses. One commentor also notes that Main Post planning guidelines should reinforce the importance of open views from the Main Post to the Bay, and another commentor opposes small-scale retail at the Main Post because it could compete with adjacent shopping districts.

Response PG-15 – In response to these comments, the Final Plan has been modified to strengthen the Plan's commitment to continue the Main Post's role as the "heart of the Presidio." The moniker for this planning district, "Visitor and Community Center," reflects this commitment, and the district will continue to be a focal point for visitor orientation as well as a community center for the people who live, work and enjoy themselves at the Presidio. The

Main Post will remain a mixed-use district, as it historically was used by the Army, with land use preferences for cultural/educational uses, offices, and housing with some small-scale lodging and meeting space, and supporting retail services.

The concern with undesirable impacts on Crissy Field (Area A) has been addressed in the Final Plan by reducing the maximum permitted building area for the Crissy Field district by 50,000 square feet from the Draft Plan. This change will lower the intensity of potential uses at Crissy Field (Area B). Nevertheless, the Final Plan continues to reflect the belief that reuse of the historic buildings along Crissy Field (Area B) can be served by installing appropriate visitor-serving uses to complement the existing visitor interest in Crissy Field (Area A). Thus, although the focus of the Main Post in the Final Plan will now be more toward visitor and community uses, this will not preclude other appropriate cultural uses at Crissy Field (Area B). See also Responses PG-12 and PG-14.

In the Final Plan, visitor-serving uses are expected to be accommodated in about one-third of the building space at the Presidio, as discussed in Chapter Two of the Final Plan. The Final Plan includes a discussion of proposed cultural uses (which are generally for public-serving programs), a stated preference for the Main Post and Crissy Field planning districts for these activities, and a listing of current facilities in use for cultural programs, the majority of which are at the Main Post. The Final Plan also identifies a preference for lodging within historic buildings at the Main Post, which would also be open to the public. In addition to public uses within buildings, key outdoor spaces of the Main Post will be enhanced to be more pedestrian-friendly and support visitor use. As an example, the removal of the pavement on the main parade ground will allow for the re-establishment of a major public space for ceremonies and celebrations that will complement the surrounding buildings. Thus, through the combination of several buildings being accessible to the public by virtue of the programs hosted inside, and the complementary inviting outdoor spaces, the Main Post will become a welcome place for visitors. The GMPA's emphasis on public use of the interior building space at the Main Post may be able to be accommodated if users can be found with the capability and interest to fund and use building space at the Main Post for cultural uses. The Final Plan assumes that there will be a mix of tenants at the Main Post, and not all tenants will offer visitor-serving uses. Such publicly accessible uses may be difficult to find for many of the Main Post buildings. Refer to Responses TS-2 and TS-3.

The PTMP's planning guidelines for the Main Post include a guideline that calls for reestablishing historic views and visual connections, and retaining and enhancing views and vistas from the Main Post to the Bay. Lastly, the Final Plan retains small-scale support retail services as a land use at the Main Post, which is a concept consistent with the GMPA. These types of uses would be similar to the types of amenities (which include a bank, a post office, some small cafes, and shops) that currently exist at both the Main Post and Crissy Field and that are intended to support the Presidio residents, workers, and visitors.

PG-16. ***El Presidio and Main Parade Ground***

One individual suggests that the Trust should give priority to archaeological excavation, exhibition, and interpretation of El Presidio and demolish the historic barracks buildings located at the site. The Fort Point and Presidio Historical Association indicates that the Plan should provide for careful study and further definition of the Main Parade ground restoration. ("We are concerned over the vagueness of restoration, which should not result in a weed and gopher infested field with no historic relevance… The design guidelines mention restoration of only the "Main Parade" ground … should be amended to include all parade grounds in the Main Post District.")

Response PG-16 – The Final Plan articulates a commitment to preserve and commemorate the significant El Presidio. Options for specific treatments will be studied in the future as part of Main Post planning. The Trust will prepare an Archeological Management Plan (AMP) for El Presidio, as stipulated in the PA, and this will inform future treatment options including building demolition, if proposed. In general, contemporary preservation policy for significant archeological sites avoids excavation for purposes of exhibition and interpretation (exposure of the fragile historic material to the elements will often lead to rapid deterioration of the unique site, and maintenance costs are prohibitive). Test excavations, done as part of research and investigations, have been done at the El Presidio site over the last several years, and will be summarized in the AMP. Refer to Planning Principle 4 within Chapter One of

the Final Plan, which describes the Trust's objectives for managing archeological resources.

With regard to planning for the restoration of the Main Post parade ground, this will be part of the Main Post planning work that will follow from the PTMP as an early implementation action. The Trust is sensitive to the historic importance of the Main Post parade ground and other landscape features, and historic research and analysis of the Main Post's cultural landscape, including the parade ground, has been completed and will be utilized in studying the options for delineating and treating the parade ground.

In response to the request to modify the guidelines to encompass all of the parade grounds at the Main Post, the Final Plan has not been changed as specifically recommended but language has been added to clarify the Trust's intent for the other open spaces. The Main Post parade ground, currently a parking lot, has changed the most over time of all of the parade grounds within the district. The "Old Parade" ground (from the Civil War era post) and Pershing Square still exist as landscaped open spaces, and have not been as severely altered as the Main Post parade ground. El Presidio plaza, currently a combination of asphalt parking lot, roadbed, and landscaped areas, has also changed over time and contains remnant archeological resources both underground as well as within the surrounding buildings. Hence, the Final Plan calls for the restoration of the Main Post parade ground (from a parking lot into a landscaped open space), retention and enhancement of the Old Parade Ground, Pershing Square, and El Presidio plaza. Restoration of El Presidio plaza would be virtually impossible given the level of change that has occurred since the Spanish/Mexican period and hence the Final Plan calls for "commemoration" of the original El Presidio (subject to further research and design, see above). The specific treatments for each of these historic spaces will be subject to future planning and design. These may consider removal or relocation of Buildings 40 and 41, which are historic buildings located within the perimeter of El Presidio. While removal or relocation may aid interpretation of archaeological resources and conservation of the site, they would adversely affect the architectural resources remaining from the last historic phase of the Main Post's development (i.e., World War II era).

PG-17. ***New Construction***

The Fort Point and Presidio Historical Association and the Council on America's Military Past recommend that the Trust not permit any new construction within the Main Post or Fort Scott districts.

Response PG-17 – The Final Plan would allow for some new construction to occur within both the Main Post and Fort Scott districts. However, further clarification behind the Trust's meaning and intent of new construction has been added to the Final Plan. See Chapter One, Planning Principle 2. New construction will primarily be used to facilitate the successful rehabilitation of historic buildings, possibly in the form of an addition or annex associated with an historic building. In other instances, new construction could be built as infill within an existing building cluster, or as a stand-alone building. However, new construction will only occur within existing areas of development, will be guided by the planning guidelines provided for each planning district, will be subject to additional environmental analysis and public input, and if pursued would be sited and configured to be compatible with the National Historic Landmark District. Other EIS alternatives assess the possibility of no new construction in these areas. Also refer to responses to New Construction comments.

PG-18. ***Land Use and Tenant Policies***

The Sierra Club requests that the Trust address the extent of the PTMP's commitment to the following policies of the original GMPA for the Main Post district: reserving the Montgomery Street barracks and all non-residential buildings for mission-based tenants (and funding rehabilitation of the barracks through non-profit master tenant lease financed by tax-exempt bonds); designating the secondary use of Building 101 as residential only as a last resort to meet housing demand; demolishing Building 211 (Burger King); designating the Officers' Club and Golden Gate Club for conference use and museums as a second priority only if privately funded; designating Funston and Pershing Halls as a bed and breakfast with secondary use as residential at Pershing Hall only if needed to meet demand; subdividing historic housing units to the extent feasible to meet demand; retaining the theater complex and allowing expansion; prohibiting new construction, especially not at the edge

of the parade ground; returning the parade ground to native grasses; limiting parking to GMPA spaces; and prohibiting an underground garage.

Response PG-18 – In response to the request to set aside specific buildings within the Main Post for mission-based tenants, refer to Responses PG-15 and TS-7. The Final Plan is programmatic and for the most part does not propose or determine building-specific uses, and therefore the commentor's specific recommendations for individual buildings is not addressed at this programmatic level. The Final Plan does state that the Main Post will be a focal point for visitor orientation and a community center for people who work, live and visit here. Under the Final Plan, non-historic buildings, such as the former Burger King (Building 211) may be removed in the future to restore historic view corridors or could be reused for an appropriate visitor-serving or other use. Building-specific use proposals will be solicited and competed, as required by the Trust Act, through issuance of RFQs and RFPs as future implementation projects flowing from PTMP. The preferred land uses at the Main Post would be office, cultural and educational uses, and housing. These would be complemented by small-scale lodging, meeting space, recreation and some supporting retail services. The Officers' Club and Golden Gate Club will continue to be used for meetings and events, and historic structures along Funston Avenue and Pershing Hall are called out in the Final Plan as priority sites for lodging.

In response to subdividing historic housing units, please refer to the Housing discussion in Chapter Two of the Final Plan. There would be a slight increase in the total number of dwelling units within the planning district and these are expected to be accommodated through a combination of subdividing large units into smaller units, converting non-residential space to residential use, and possibly some new construction. The extent and feasibility of subdivisions and conversions will require further building-specific analysis, and will only be undertaken if it can be accomplished in a manner consistent with the Secretary of the Interior's Standards for Rehabilitation of Historic Properties.

The Final Plan anticipates the rehabilitation and reuse of the historic Presidio Theatre; construction of a building addition or annex could be considered as part of the rehabilitation in order to make it feasible and viable for reuse. New construction at the Main Post that would reinforce historic patterns of spatial organization and complement the rehabilitation of adjacent historic buildings may be considered in the future under the Final Plan. Building additions or new infill construction will be carefully integrated into the Main Post's landscape and carried out in accordance with the district's planning guidelines. See Chapter Three of the PTMP.

Consistent with the GMPA proposal, the Final Plan calls for the restoration of the Main Post parade ground. Its exact treatment and design details will be the subject of future site-specific planning, which may consider alternative turf treatments including native grasses. As for parking, the Final Plan will provide a lesser reduction in the number of parking spaces compared to the GMPA, but will place greater emphasis on encouraging alternative modes of transportation through TDM (including parking fees) to reduce parking demand. The Final Plan states the goal to consider removal or reduction in size of large surface parking lots and to consider options, such as relocation of spaces, for parking to serve visitors and tenants. In response to comments, the Final Plan has removed references to and does not propose underground parking at the Main Post as an option.

FORT SCOTT DISTRICT

PG-19. *Housing vs. Institutional Uses at Fort Scott*

Commentors offer a wide range of opinions on appropriate uses at Fort Scott. The Sierra Club, the University of San Francisco, and various individuals support institutional uses at Fort Scott, with the Sierra Club advocating use of all buildings surrounding the parade ground as an institute (rather than allowing some residential use). Another commentor opposes this view ("Rethink Fort Scott. Parks are not for conventions – use Fort Scott as affordable lodging for families.") Others submit that lodging at Fort Scott would be acceptable as long as it supports a primary institutional use there, such as conference/education. Others, including Urban Ecology and various individuals, recommend that the Final Plan identify housing as a preferred use for Fort Scott, particularly within the existing North and East Fort Scott housing clusters. Several individuals support educational institution uses at Fort Scott, such as a college or university, and at least one would support

educational use existing side-by-side with other institutional uses within a "contemplative campus."

Response PG-19 – The Trust has considered the differing suggestions for Fort Scott and combined a number of the ideas offered into the proposed mix of uses in the Final Plan. The preferred land use for the Fort Scott district, as stated in the Final Plan, will be an organization or group of organizations devoted to research, policy development, education, and related activities complemented by a strong residential component accommodated in several of the former barracks surrounding the parade ground. Other uses that would be compatible in this campus-like setting include conference space, lodging, recreation, office, community serving retail, and some maintenance facilities. Although not all commentors agree, the Final Plan anticipates that some of the historic barracks around the parade ground could be converted to residential use. Additional residential use within the district is called for at North Fort Scott where existing units could be reconfigured or removed and replaced with new more amendable units. See Chapter Two, Housing, Figure 2.4.

PG-20. ***New Construction within the Fort Scott District***

The Fort Point and Presidio Historical Association, California Heritage Council, and PAR recommend that the Plan prohibit (or restrict) new construction in the Fort Scott district. ("We are opposed to any new construction which we feel will adversely affect the historic character of the district and is an unnecessary expense.") Other commentors support some replacement housing units in existing housing areas within North and East Fort Scott.

Response PG-20 – The Final Plan allows for some new construction to occur within the Fort Scott district. For example, a meeting space that could not be accommodated in a historic building may be required to support the educational programs envisioned for Fort Scott. New construction could also involve removal and replacement of non-historic housing within the enclave behind Pilots' Row to provide for more compatible structures and a more efficient use of space than currently exists. This enclave is quite distinct and separate (visually and physically) from the central portion of the Fort Scott district. Another example of new construction might be the potential relocation of the Golden Gate Bridge District's maintenance functions from the toll plaza area. Relocation could require some new construction, as was provided for in the 1994 GMPA for this purpose.

Further clarification about new construction has been added to the Final Plan. See Chapter One, Planning Principle 2. New construction is retained as an option to be used to facilitate the successful rehabilitation of historic buildings. In other instances, new construction could be built as infill within an existing building cluster, or as a stand-alone replacement building. However, new construction within the Fort Scott district will only occur within existing areas of development, will be guided by the planning guidelines provided for the district, will be subject to additional NEPA and NHPA analysis and public input, and will be sited and configured to be compatible with the National Historic Landmark District. The Final Plan indicates that rehabilitation and reuse of existing buildings would be fully considered before pursuing new construction.

PG-21. ***Presidio Trust Control***

One individual indicates that the Trust should not have allowed itself "free rein" in the Fort Scott district ("there will be no external tenant, no rental income projected for the site, and indeed, a projected program budget of $10 million").

Response PG-21 – The commentor significantly misunderstands the Plan's proposals for the Fort Scott district. The Final Plan includes planning district concepts, planning principles, and planning guidelines which will direct future decisions and changes the Trust makes throughout Area B. The Final Plan also states the Trust's commitment to the preservation of the Presidio's NHLD status. Furthermore, the Programmatic Agreement signed between the Presidio Trust, the ACHP, the SHPO, the NPS, and concurring parties sets forth a process for review and consultation for future changes that might have the potential to significantly affect historic resources. All of these measures are safeguards to the protection not only of the historic Fort Scott district but of all of the Presidio under the Trust's jurisdiction.

Rehabilitation and reuse of buildings at Fort Scott is expected to be a costly endeavor, and will require substantial commitments of funds by the Trust and third parties (tenants or master developers). Until specific information is

available regarding each individual building – its condition, cost to rehabilitate, and marketable uses – it would be difficult to predict the income it might generate or the number and type of tenants involved. Instead, the Final Plan identifies a range of "preferred" uses and contains principles and guidelines to inform future decisions.

PG-22. ***Land Use Policies***

The Sierra Club requests that the Trust address the extent of the PTMP's commitment to the following policies of the original GMPA for the Fort Scott district: establishing a single-entity research institute as a priority use; allowing related conferencing and lodging if needed; allowing bed and breakfasts at Pilots' Row with secondary use of Scott Hall for market-rate employee housing; using North Fort Scott for low-cost housing; rehabilitating historic housing to the extent feasible; using Barnard Hall and Building 1309 for single-room-occupancy units; demolishing five buildings as called for in the GMPA; dedicating all space around the parade ground to an institute, with provision of employee housing at North Fort Scott; and using foundation funding for rehabilitation of institute buildings.

Response PG-22 – As stated in the Plan, the Trust will actively welcome a single tenant or mix of organizations at Fort Scott dedicated to research, policy development, education and related activities, all complemented by a strong residential component. Preservation of Fort Scott's rich collection of historic buildings and landscapes will remain the priority. Like the GMPA, the Final Plan also identifies conferencing and lodging as potential land uses. The PTMP is not a building treatment plan; however, regarding clusters of buildings for residential use, Chapter Two in the Housing section identifies several historic residential clusters that would be retained for residential use, including the Pilots' Row houses. Some of the historic barracks buildings around the parade ground could be retained for housing or converted to other uses. North Fort Scott would be retained or replaced for residential use. With regard to who should benefit from Presidio housing and affordability issues, please refer to responses to Housing comments. The Final Plan allows for a maximum demolition of up to 70,000 square feet at Fort Scott and does not specify which buildings might be demolished. See Chapters One and Two for a discussion of building demolition. The Plan does not preclude the possibility of demolishing those buildings identified for removal in the GMPA in the future. With regard to funding concerns, refer to Chapter Four of the Final Plan.

PG-23. ***Relocation of Golden Gate Bridge Facilities***

The Golden Gate Bridge Highway and Transportation District recommends that the PTMP address the GMPA recommendations to relocate Golden Gate Bridge facilities to Fort Scott.

Response PG-23 – The Final Plan allows for the possible relocation of the Golden Gate Bridge Highway and Transportation District's maintenance facilities, as was recommended in the 1994 GMPA. In Chapter Three, Fort Scott planning district, it is noted that this proposal would require new construction in Area B and would be subject to future planning in collaboration with the District.

PG-24. ***Location of Native Plant Nursery***

The Golden Gate National Parks Association recommends that the Final Plan commit to a permanent site in the Presidio for the native plant nursery.

Response PG-24 – The Trust and the NPS are currently conducting a facilities needs assessment to determine park operational space needs and locations. This study will explore options for reducing operational costs through co-locating similar functions, strategies for reducing currently occupied space, and overall capital cost needs to bring facilities up to code. In addition, the Trust, NPS and GGNPA are negotiating agreements for continuing their collaboration on natural resources projects. The agreements include a designated amount of building space for the native plant nursery, although the location and delineation of the facility has not been determined. At least for the short term, it is anticipated that the nursery will remain in its current location. Any changes in the future would be coordinated with the organizations involved.

LETTERMAN DISTRICT

PG-25. ***Land Use Policies***

The Sierra Club requests that the Trust address the extent of the PTMP's commitment to the following policies of the original GMPA for the Letterman district: allowing no additional housing, reevaluating the "Lucas" (Letterman Digital Arts Center) project, and demolishing Buildings 1029 and 1030 and moving Swords to Ploughshares to the PHSH barracks to allow Tennessee Hollow restoration. Two individuals also indicate that no replacement housing should be allowed at Letterman. Other individuals recommend that, if the LDAC project fails to proceed, the cleared site be kept in open space. Another recommends concentrating commercial enterprises at Letterman.

Response PG-25 – As was the case in the 1994 GMPA, the Letterman district is one of the most dense planning districts and it will continue to be a compact, mixed-use office and residential area with support services such as food service or small-scale retail under the Final Plan. The Final Plan allows for a potential increase in dwelling units within the Letterman District (see Chapter Two), including the possibility of replacement construction for residential uses. The GMPA called for the retention of Buildings 1028, 1029 and 1030. The Final Plan allows some flexibility to determine in the future whether these buildings are retained or removed. The Final Plan assumes the retention of the units within Buildings 1029 and 1030 that currently house the Swords to Ploughshares tenants with the possibility of relocating the buildings. Building 1028 is identified as housing to be either retained or replaced. This West Letterman site(where Building 1028 is located) would be a preferred location for infill construction to provide more compatible residential structures close to work sites. Refer also to Response BR-7.

With regard to comments about the Letterman Digital Arts Center (LDAC), that project is well underway and was the subject of a separate planning and environmental analysis process. Following completion of the Trust's Letterman Complex Final EIS and Record of Decision (May 2000), the pre-existing two Letterman hospital and research buildings have now been demolished. The Trust will shortly complete all of the site preparation work, and construction of the new LDAC will then begin. Refer to Responses EP-16 and EP-17 for additional information on the treatment of the LDAC project under PTMP.

EAST HOUSING DISTRICT

PG-26. ***Rehabilitation of Recreational Facilities***

San Francisco Little League requests that the East Housing district section of the PTIP be revised so that it refers not just to "existing active recreation facilities," but also to facilities such as Pop Hicks Fields that were formerly used for active recreation and that now need rehabilitation.

Response PG-26 – In response to comments, the Final Plan, Chapter Three, East Housing planning district text has been modified to state that the Pop Hicks Field will be restored for active recreational use if consistent with the environmental cleanup plan established for this area, which is proceeding separately from the PTMP process. In general, specific sites and types of recreational activities will be determined through future project-specific proposals, but within the East Housing district, the Final Plan allows for recreational activities that are compatible with the Tennessee Hollow restoration and other natural resource enhancement projects. In addition, pedestrian access to the area will be enhanced in accordance with the Trails and Bikeways Plan to enhance visitor access and recreational opportunities.

PG-27. ***Land Use Policies***

The Sierra Club requests that the Trust address the extent of the PTMP's commitment to the following policies of the GMPA for the East Housing district: demolishing 52 units at MacArthur and Waller Street to restore Tennessee Hollow, demolishing Buildings 777/779/808/809, allowing no new construction or infill, subdividing non-historic units to meet housing demand, and subdividing historic units with basement-level studios to the extent feasible. The NRDC asks why housing is not shown as a preferred land use in the East Housing Planning District on Figure 6 of the EIS.

Response PG-27 – The Final Plan calls for the removal of 66 non-historic units, including MacArthur Avenue, Waller Street, Buildings 777, 808 and 809, within the East Housing planing district to restore open space and the

Tennessee Hollow stream corridor. See Final Plan, Chapter Two, Figure 2.4. The Plan proposes to retain or increase the existing number of housing units by dividing large units into smaller ones, and possibly through compatible replacement construction elsewhere within the district. New construction will not preclude the restoration of Tennessee Hollow and could, in fact, be a demonstration project for compatible and sustainable building design within a watershed. The extent of unit subdivisions will be subject to future design analysis; new construction would require additional planning, environmental analysis, and public input. With respect to the NRDC's comment, the preferred use stated in Figure 6 in the Draft (and Final) EIS for East Housing is "housing". Refer also to Response BR-7.

SOUTH HILLS DISTRICT

PG-28. ***Land Use Policies***

The Sierra Club requests that the Trust address the extent of the PTMP's commitment to the following policies of the original GMPA for the South Hills district: demolishing Wherry Housing, one-third by 2013 and the balance no later than 2020; considering demolition of West Washington over time to protect natural resource habitat; and allowing no new construction. Various individuals recommend comprehensive planning for restoration within the South Hills, Lobos Creek and PHSH areas, and removal of the Building 1750 complex for completion of dune habitat restoration.

Response PG-28 – As did the original GMPA, the Final Plan anticipates removal of Wherry Housing over time. Its removal would be phased over about 30 years and the exact phasing would depend upon the availability of revenues to fund demolition and natural habitat restoration. Financial modeling assumes removal of Wherry Housing in thirds: one-third by 2010, another third by 2020, and the final third by 2030. See Chapter Four, Park Implementation. The phased removal would enable the integration of the core habitat between the Lobos and Wherry Dune lessingia sites. In addition to Wherry Housing, the Final Plan calls for the removal of the western West Washington housing units and some of the northern East Washington units, to allow for natural resource and other open space enhancement projects. No new construction is contemplated for the South Hills district.

The Trust has already undertaken the commentors' recommendation to plan restoration comprehensively. The adopted VMP looks at the park from a vegetation zoning perspective rather than a planning district perspective. As a result, the planning for natural resource and vegetation preservation and restoration in the southern half of the Presidio will be based on a system-level approach and not a planning district one. Consistent with the 1994 GMPA, the Building 1750 facility will remain as the Presidio Trust's Facilities offices. The area surrounding Building 1750 is primarily in Area A, under the NPS jurisdiction, and is called out as a Special Management Zone (SMZ) in the VMP. Completion of restoration planning for future dune habitat restoration activities would be coordinated through planning for the SMZ. The Trust is undergoing USFWS Section 7 consultation under the Endangered Species Act and has submitted a Biological Assessment that outlines the phased demolition. It is anticipated that the Service will provide a Biological Opinion regarding the analysis and conservation measures provided within the Biological Assessment and EIS. The Trust is also providing comments to the USFWS on the Draft Recovery Plan for Coastal Plants of the Northern San Francisco Peninsula regarding implementation feasibility.

PG-29. ***Recreational Facilities and Habitat Restoration***

Two individuals request that the Trust clarify the extent of access to recreational facilities in the South Hills district. San Francisco Beautiful recommends that the golf course edges be treated as natural areas, while one individual recommends removing the golf course and restoring it to native habitat. The San Francisco State University Biology Department recommends restoration of the ridgeline connecting the Lobos Creek and Tennessee Hollow watersheds.

Response PG-29 – The South Hills district currently has many publicly accessible recreational amenities, for both passive and active recreation, which will be preserved and retained. These include the Presidio Golf Course, Rob Hill Campground, numerous hiking trails, and the Julius Kahn Playground (managed by the CCSF). Improved access to these amenities is included in the Access and Circulation section of the District Concept in the Final Plan, Chapter Three. For further discussion on recreational uses, please refer to the Final Plan, Chapter One, Planning Principle 10.

The Final Plan does not contemplate removal of the Presidio Golf Course as the commentor suggests. The golf course is a contributing feature of the NHLD, is currently under lease to the Palmer Golf Corporation, and provides a recreational amenity for the general public. Many of the golf course's edges abut natural areas, including historic forest stands, and will be treated according to the recommendations of the approved VMP. The Trust is currently working with Arnold Palmer Golf Management to develop a Habitat and Wildlife Management Plan for the golf course. The plan will focus on the "natural areas" (non-turf areas), and will include a baseline natural resource values assessment and management strategies and recommendations that would promote greater wildlife movement between the Marina and Lobos Valley watersheds, and increased habitat diversity and viability. This planning effort is expected to begin in late 2002.

TENNESSEE HOLLOW

PG-30. ***Planning Recommendations***

The NPS and one individual recommend that the Trust designate the Tennessee Hollow watershed as a separate planning district focused on resource stewardship. One individual recommends that the eastern boundary of the Main Post district be realigned to exclude Tennessee Hollow, allowing a more holistic approach to restoring this watershed. Another individual recommends that the Trust increase its commitment to restoring Tennessee Hollow by providing adequate setbacks; removing the landfill, Morton Street ball field, and buildings along MacArthur; and no construction of new buildings. The Sierra Club and one individual recommend policies for restoration of the watershed and its riparian habitat, and no new construction in Tennessee Hollow.

Response PG-30 – Tennessee Hollow traverses several planning districts, including the eastern edge of the Main Post. The boundaries of the planning districts are not determinative of future actions, such as the extent of the Tennessee Hollow restoration, and therefore the boundary of the Main Post planning district has not been changed from the Draft Plan. Planning for Tennessee Hollow's restoration will examine the natural system and apply watershed management principles to the creek tributaries and riparian corridor as a whole functioning ecological system, rather than as segments between planning districts. The alignment represented in the Plan is consistent with historical literature and maps.

Not unlike the VMP that studied the Presidio's vegetation zones, natural resource preservation and enhancement projects will generally be approached and studied as systems rather than according to any generally artificial planning district boundaries that exist only on a map.

For response to commentors' other issues concerning Tennessee Hollow, refer to Responses BR-5, BR-6 and HO-14.

PG-31. ***Effects on Historic/Cultural Resources***

The Fort Point and Presidio Historical Association and the California Heritage Council recommend that the Plan and EIS address possible adverse effects of Tennessee Hollow restoration and enhancement on individual historic properties and the integrity of the National Historic Landmark District. In light of their concerns, they strongly suggest that the Tennessee Hollow project should be subject to further study. The Fort Point and Presidio Historical Association, and the Council on America's Military Past, and several individuals suggest that the benefits of the restoration project are greatly outweighed by the costs to historic resources.

Response PG-31 – The Trust recognizes that the restoration of Tennessee Hollow implicates a number of important, sometimes competing, policy goals that must be balanced. The planning process for the restoration of Tennessee Hollow will be a separate planning process with appropriate environmental analysis. This planning effort has begun with the collection of baseline data and monitoring, an initial public workshop (held in November 2001), and is anticipated to continue this summer, with a public scoping meeting occurring sometime in the Fall 2002. One of the key studies underway is an assessment of existing cultural resources within the study area, including archeological resources and the cultural landscape. As part of this planning effort, the Trust expects to study alternatives that explore a range of options for the creek's restoration and the potential effects on cultural resources. As stated in Chapter One of the Final Plan, the Trust is committed to the preservation and protection of the NHLD, and therefore, through future planning, will seek to minimize harm to those resources that contribute to the District's integrity.

While there may be an effect on individual properties over time, or as part of an overall planning effort in which other resource values are balanced, the Trust will protect the status of the NHLD. Lastly, as part of the planning efforts for Tennessee Hollow, costs will be included and funding for the restoration will be contingent upon numerous factors, from Trust-generated revenues to philanthropic support. Refer also to Response HR-16.

OTHER

PG-32. ***Gates***

The Pacific Heights Residents Association and various individuals indicate that the Trust should not open new gates nor reopen any old gates. Others indicate that the Trust should clarify its plans for the Greenwich Street Gate, and support opening this gate to cyclists and pedestrians.

Response PG-32 – No new gates without historic precedent are contemplated in the Final Plan. However, the Final Plan calls for the reestablishment of the historic pedestrian entry at Chestnut Street for pedestrians only, and the historic Greenwich Street Gate for pedestrians and bicycles only (no vehicles). Reestablishment of these two pedestrian gates will provide for easier visitor access, convenient connections to public transit, and an enhanced pedestrian circulation system. In addition, the Plan allows for the potential re-opening of the 14th Avenue Gate to vehicular traffic, subject to future planning and analysis associated with the reuse of the PHSH district.

PG-33. ***Landfill Clean-Up and Water Conservation Programs***

The Sierra Club requests that the Trust address the following policies in the Final Plan: ecological restoration; clean-up and habitat restoration at landfills in Tennessee Hollow, Graded Area 9, and Landfill 8; and water conservation and recycling programs.

Response PG-33 – Refer to Chapter Two, Infrastructure and Facilities, in the Final Plan for each of these subject areas. The clean-up and remediation program for the Presidio is a separate and distinct process from the PTMP. Specific remedial action proposals will be determined through that process. With regard to water conservation and recycling programs, refer to Chapter Two of the Final Plan, and Section 4.6.1 of the Final EIS. The Trust has active programs for solid waste management (including the Presidio Recycling Center, the Presidio Salvage Program, and Composting) and water conservation, and has proposed an on-site water recycling system which is currently undergoing environmental review. Refer to Response UT-3, for additional information on water conservation and Mitigation Measure UT-9 regarding waste division.

PG-34. ***Incorporation of Specific GMPA Concepts and Objectives***

The Pacific Heights Residents Association (PHRA) provided a letter reciting all of the 1994 GMPA concepts and objectives that it recommends the Trust to incorporate into the Final Plan, as well as various opinions and criticisms of the Draft Plan. The PHRA specifically requests the Trust to identify why each of the recommendations (for vision, objectives, and implementations) are or are not possible for inclusion in the Final Plan.

Response PG-34 – Responses to issue-specific comments raised in the PHRA letter are provided in multiple sections of this document (refer to the Directory in Chapter 6). The focus of this response is on the overarching recommendations for inclusion of the various GMPA objectives into the Final Plan.

The PTMP looked to the 1994 GMPA as the foundation for the Trust's planning, and it is reinforced by both the Trust Act and Trust policies articulated in the Final Plan. The one area in which the Presidio Trust's Final Plan departs from the GMPA is in the Vision. See Response VI-6. Otherwise, as stated in the Draft Plan on page 17, the planning principles contained in Chapter Two of the Draft Plan largely came from the GMPA. In some instances they were modified or newly proposed to address Trust management approaches, new opportunities, or Trust Act mandates. Chapter Two of the Draft Plan also provided information about current activities underway to implement concepts consistent with the GMPA. These planning principles are carried forward into the Final Plan and emphasize the importance of the Trust's role in protecting, managing, and enhancing the Presidio's significant park resources. See Response GP-1.

The following is a cross-referencing for where these concepts from the GMPA, are found in the PTMP.

GMPA	Final Plan
Vision	See responses to Vision comments and Final Plan Overview
Preservation and Recreation	These concepts are embedded in the content of Chapters One and Two in the Final Plan, which promote the preservation and protection of valuable park resources and provision of interpretive, educational, and recreational opportunities within the Presidio
Orientation and Accessibility Improvements	See Planning Principle 15, Final Plan
Interpretation and Education	See Planning Principle 11, and Chapter Two, Land Use - Public Uses in the Final Plan
Celebration of History, Culture and the Arts	See Planning Principle 14, Final Plan
Recreation and Renewal	See Planning Principle 10, Final Plan
Resource Management	See Planning Principles 1, 2, 3, 6, 7, and 8, Final Plan
Historic Building Rehabilitation	See Planning Principle 1, Final Plan
Cultural Landscape Preservation	See Planning Principles 1, 2, and 3
Scenic Vista Enhancement	See Planning Principle 9, Final Plan
Archeological Investigation	See Planning Principle 4, Final Plan
Collection Preservation	See Planning Principle 5, Final Plan
Open Space Extension	See Planning Principle 9 and Chapter Two, Land Use - Open Space in the Final Plan
Native Plant Enhancement	See Planning Principle 6, Final Plan
Historic Forest Rehabilitation and Preservation	See Planning Principle 3, Final Plan
Wildlife Protection	See Planning Principle 7, Final Plan
Water Resource Management	See Planning Principle 8, Final Plan
Sustainable Foundations	See Chapter Two, in particular the sections on Transportation, and Infrastructure and Facilities in the Final Plan
Comprehensive Transportation Strategy (there are multiple headings - recommend we address under this one umbrella)	See Chapter Two, Transportation, in the Final Plan
Community Support - Residential Use	See Planning Principles 12 and 13, as well as Chapter Two, in particular the section on Land Use that includes a discussion on housing and other building uses
Community Services and Facilities	See Chapter Two, Land Use in the Final Plan
Public Safety	See Chapter Four, Public Involvement and Partnerships in the Final Plan
Sustainable Design and Conservation Practices	See Chapter Two, Infrastructure and Facilities (all sections), in the Final Plan
Integrated Pest Management	See Planning Principle 6, Final Plan
Pollution Abatement	See Planning Principles 8, 9 and Chapter Two, Transportation in the Final Plan
Hazardous Waste Cleanup	See Chapter Two, Infrastructure and Facilities- Environmental Remediation, in the Final Plan

4.8 TYPE OF PLAN (TP)

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FLEXIBILITY OF THE PLAN

TP-1. *Suitability of a Flexible Planning Approach*

Commentors express differing opinions about the Trust's use of a flexible planning approach. Several commentors, including San Francisco Beautiful, note that the concept of a general plan and broad policy framework is appropriate, citing the need to respond to changing future economic and market conditions. ("The Trust is wise not to micro-plan within the context of general land use designations since recent market events prove once again that markets are cyclical in nature.") More commentors, however, including several local neighborhood groups and land use interest groups, express concern over the flexibility and latitude of the Draft Plan. They believe the Draft Plan is so vague as to impose no real constraints on future actions, and allows the Trust Board and staff unlimited discretion to select future land uses. (The Draft Plan "is so general it gives future Board and staff almost unlimited discretion to select land uses.") Some also believe the degree of flexibility in the Draft Plan prevents it from being used as a framework for future management and decision-making; leaves too much to resolution through consensus building on future site-specific, district-level and issue-oriented plans; and leads to a fear of over-development of the Presidio. ("The Draft [Plan] is so ambiguous, so heavily qualified, and so laden with disclaimers that it seems to commit to virtually nothing!" "The PTIP is quite vague. It is a breeding ground for slowly but surely turning the Presidio into the equivalent of a seaside resort, office park, and suburb, rather than a unique, pristine as possible national park.") To allay fears and improve public acceptance of the Plan, commentors ask for a better balance between flexibility and constraints, better definition of significant planning ideas in the Final Plan, and a commitment to more specific future plans and proposals, coupled with full public involvement.

Response TP-1 – In its approach to development of the Draft Plan, the Trust had in mind the point of view of those commentors who recognize the usefulness of a planning approach that includes an element of flexibility. Even after fully considering commentors' concerns on this issue, the Trust still believes a flexible planning approach is both needed and appropriate. One of the primary factors that now distinguishes the Trust's needs from the 1994 GMPA is the need to consider economic and market possibilities in a new way. The financial plan of the GMPA (the Presidio Building Leasing and Financing Implementation Strategy, July 1994) assumed guaranteed outside funding. In short, Congress will terminate outside funding. Philanthropic contributions are welcome, but at best uncertain. The Trust must depend on leases of properties in Area B to assure financial sustainability and assure the preservation of the Presidio as a national park. The Trust cannot be sure of the timing of cash flow, the availability of tenants, or expected financial outcomes, and so must adopt a plan under which financial uncertainty can be managed. For this basic reason, and because it would be unrealistic for any agency to predict with certainty circumstances that will arise over the next 20 to 30 years, the Final Plan must be adaptable enough to allow the Trust to consider alternative ways to generate revenue and respond to market conditions by considering alternative users, if necessary.

The Final Plan therefore remains a programmatic plan for all of Area B that includes some flexibility to determine future site-specific uses. It defines a comprehensive policy and land use framework within which the Trust will pursue more specific project proposals. The Trust's programmatic approach to

comprehensive planning, although not always welcomed by many of the commentors, is appropriate and accepted in other land use planning contexts. The programmatic planning approach is perhaps most widely used and understood in the city planning arena, where municipalities commonly develop a city's General Plan and a zoning ordinance that defines broad policies and a land use framework. More specific land use projects are then proposed, reviewed and evaluated for consistency with the overall policies of the General Plan and the land uses and standards of the zoning ordinance. This is essentially the approach of the PTMP and is more appropriate than a specific plan, which would require constant amendment as conditions change.

The Trust nevertheless recognizes, based upon comments, that the public is distrustful of the programmatic approach and the flexibility it allows, regardless of its utility to the success of the Plan. The Trust has therefore changed the Plan in several ways to address these concerns. First, the Trust has substantially changed the style of the Plan to make its content more clear. The way in which the Draft Plan was presented created the mistaken impression that there was greater degree of flexibility than the Draft Plan actually allowed. The text of the Draft Plan apparently made it difficult for reviewers to see and to understand the overall direction of land use at the Presidio or the policies and parameters that would constrain inappropriate development. The Final Plan is therefore shorter, more direct, and to the point. This change in style clarifies the direction of the PTMP and better informs the public of its details.

As an example, the Final Plan now makes clearer its overall land use program: about three-quarters of the park will be open space and only one-quarter built space, which will be within already developed areas of the park. Furthermore, the Final Plan gives better definition to the built space, explaining that today's existing square footage will be reduced over time and within what remains, about one-third will be public serving uses, another third will provide housing, and the last third will provide office uses for a mix of public-serving and private-sector tenants.

Other ways in which the Final Plan has been changed to address commentors' flexibility concerns is to provide both increased specificity where possible and assurances that future public process and input will be available where flexibility must be retained or uncertainty exists. Refer to Responses PI-1, PI-2, PI-8 and PI-10. As examples, the housing element has been made more specific, showing within ranges how the overall housing goal can be achieved when broken down by planning district. Some commentors are very concerned at what they perceived as the failure to specify the exact location, size, and details of future housing construction. The Final Plan still holds open the possibility of new construction to replace existing housing units removed to create additional open space; however, the location is clearly constrained to previously developed areas where the integrity of the NHLD will not be compromised. Example locations are described and the number of units is constrained (200 to 400). Remaining uncertainties are further constrained by providing for a thorough public process and environmental review in the future, if and when the specifics of any new housing construction is proposed.

Similarly, the overall goals for educational uses have been disaggregated from cultural uses, and a few building-specific preferences have been identified for certain cultural users (museums). More specificity, too, is now offered with respect to lodging. See Responses LO-1 and LO-5 for additional information on lodging. In response to comments that had imagined newly constructed, large-scale, high-rise, resort-style lodging along the waterfront, the PTMP now makes clear that limited lodging uses are more likely and are preferred for existing buildings at the Main Post, Crissy Field, and Fort Scott districts. New construction is seen only as a way to facilitate the historic rehabilitation and reuse of existing historic buildings, if required, through building additions or annex structures.

With these changes, the Trust believes it has provided a plan with a workable mixture of flexibility, specificity, constraints, and further public process that, as requested by commentors, strikes a balance. When the increased Plan specificity and assurances of future public process are combined with the policy principles articulated in Chapter One of the Final Plan and the planning guidelines in Chapter Three, the Final Plan is a far cry from what one commentor had imagined as a "breeding ground … for a seaside resort, office park, and suburb…" The Trust will not and cannot use the flexibility of the Plan to impair the qualities that make the Presidio a park and a treasured resource.

SPECIFICITY OF THE PLAN

TP-2. ***The Plan Should be More Specific***

Several commentors go beyond expressing concern with planning flexibility and instead call for the Trust to develop a much more specific Final Plan. A few comments note generally that more details should be provided to the public in the Plan, while others make more specific suggestions that the Trust develop a building-specific plan by planning district. ("The Trust should choose and identify a preferred use for each building. It should present a building use map, along the lines of that developed by the Sierra Club, identifying a clear, unequivocal description of the use and location of each building.") Some commentors ask the Trust to specify what kind of new construction is envisioned, how much, and its specific location. ("If decisions were made, the final EIS would be a far more understandable and useful planning document... The need for future flexibility ... is always available ... through a plan amendment process.") One commentor stated the belief that the Trust has "very specific ideas" and not to provide building-specific details "casts a pall of disingenuity" over the Plan. Several organizations, including the Sierra Club and the NRDC, infer that the PTMP should be a building-specific use plan (similar to the plan prepared and submitted by the Sierra Club) which identifies priority and secondary uses for buildings, and request that such a plan is included in the Final Plan.

Response TP-2 – In response to comments that asked for more detail in the Plan, the Trust has added specificity to certain elements – including housing, lodging, education, and cultural uses – of the Final Plan. See Response TP-1 and TP-5 above, as well as the Introduction of this document, which provides a summary of the changes made in the Final Plan and Final EIS in response to public comments. The Trust agrees with commentors that adding this level of specificity to the text and graphics of the Final Plan was important to improve its clarity.

The Trust declines, however, to implement the suggestion of those commentors who urge the Trust to develop a prescriptive, building-specific land use plan rather than a programmatic plan. These commentors, apparently out of concerns over the Plan's flexibility, suggest as a solution an approach that does not effectively consider or address the financial and market uncertainties that the Trust must manage. As is pointed out in the Trust's statement of need for the Plan: "At times, the Trust may not be able to conclude a financially viable transaction on an otherwise desirable project because of, for example, obsolete building configurations, tenant needs, or other factors. In some of these circumstances, the Trust may wish to consider other options such as alternate uses, a change in location, or possible building demolition with new replacement construction. At other times, apparently favorable projects may have to be deferred, changed or foregone because of financial factors such as cash flow concerns or market conditions. Market demand could fail to deliver an intended use, or changed market conditions could require a different approach to leasing or financing that better addresses the existing market opportunities or realities at the time. The Trust needs the flexibility of a programmatic, rather than prescriptive, plan to respond to market factors like these."

A building-specific plan presents the same problems that the NPS and Trust already faced as they worked to implement the GMPA's building use prescriptions. For example, in the GMPA, the Letterman Army Medical Center (LAMC) and Letterman Army Institute of Research (LAIR) were identified for use as medical and research facilities. When the NPS issued its Request for Qualifications (RFQ) in 1993 soliciting proposals for reuse of the Letterman Complex, of 16 proposals received, only two were for medical laboratory use of LAIR. Of the two, NPS chose to enter into negotiations with the UCSF Medical Center. These lease negotiations were unsuccessful, as were other lease negotiations with the California State Department of Health Services (DHS), proposing use of the laboratories for public health programs, and later with the City and County of San Francisco Department of Public Health for temporary use of LAIR as laboratory and office space. Later, the Trust also tried to find a user that fit the prescribed use in the GMPA, but ultimately had to consider others outside the medical and research arenas. This approach met with objections, at least in part because it departed from the specific use prescriptions of a building-specific plan. See Response AL-1 for further examples of the GMPA's specified building uses that have not come to fruition.

Developing a prescriptive plan and amending it each time a specified building use cannot be met, as is suggested by comments, is inefficient, makes little

sense given the Trust's financial and leasing mandates, and is a misleading approach. The process involved in soliciting potential tenants is already a lengthy one. Adding the additional step of having to complete a plan amendment process each time the Trust needs or wants to consider a different tenant type would unreasonably lengthen an already lengthy and cumbersome leasing process. The Trust simply does not know and has not yet decided what the specific use of each building at the Presidio could or should be. These building-specific proposals can be best made in the context of more targeted area site planning, or through leasing solicitations to determine specifically what the market will support. Creating a building-specific plan would suggest a level of decision and certainty that does not exist and cannot exist in any plan that will take 20 to 30 years to implement, and would therefore be misleading. As has already been said, where uncertainty remains or flexibility has been retained, further public process at the time in the future, when more specific projects are proposed, will ensure that physical changes are in keeping with the Presidio's character, and that the public's input is considered. Rather than guessing today at the intended use of each building, the PTMP sets out the general character of each district along with overall square footage and the extent of certain uses. Leasing proposals, when made, will fall within these bounds and be consistent with the general land use and square footage described. If a proposal is inconsistent, or involves new impacts not considered in this EIS, the Trust will analyze the potential effects of any proposed inconsistencies and provide for a public process and review as called for under NEPA and the Trust's own policies. Refer to Responses PI-1, PI-2, and PI-10 for additional discussion of future planning and public involvement.

TP-3. ***More Specific Plan is Needed***

A few commentors express the opinion that a more specific plan is needed because the Presidio is a public park and the public is therefore entitled to know what the Trust Board expects it to look like in 2013 and to participate in a meaningful manner in shaping its future. They ask that the Final Plan provide more specificity so that it imposes real limits to evaluate the stewardship of the Board and determine progress toward goals.

Response TP-3 – The Trust staff and Board believe that the PTMP and the planning and environmental review process that has surrounded its development has offered a comprehensive, realistic, and clear picture of what is now known about the land use goals and overall approach to the stewardship of Area B of the Presidio. In response to comments, both the clarity and the specificity of the Plan have been improved, and these changes serve to make clear that the Presidio will retain its park-like character and remain largely open space, and that leasing will be split among three categories of land uses – public uses, housing, and office uses. See Response FL-1 above for further discussion of how the clarity and specificity of the Final Plan have been changed in response to comments.

The Final Plan contains goals statements with which to evaluate the stewardship of the Trust. The planning principles in Chapter One set the policies under which all future planning and projects will proceed. Chapter Two defines land use, transportation, and infrastructure goals, and the district-level parameters in Chapter Three provide further qualitative standards and quantitative limits.

A more specific plan would not offer a clearer picture and would, in fact, offer a misleading picture. The Trust simply does not know and has not yet decided what the specific use of each building at the Presidio could or should be. Creating a more specific plan by specifying site-specific users and uses would suggest a level of decision and certainty that does not exist and cannot exist given the amount of space involved and the variables that will influence its use or disposition over the next 20 to 30 years. The PTMP planning process is not the end of the decision-making process for Area B; it is the beginning. The public will have many further opportunities to consider and evaluate the stewardship of the Trust as the Plan is implemented. Refer to Responses PI-1, PI-2, PI-3, and PI-10 for additional information.

MEANS TO ACHIEVE FLEXIBILITY

TP-4. ***Use GMPA Approach to Achieve Flexibility***

A few commentors suggest that the Trust could provide the level of specificity in the GMPA and still have needed flexibility. ("A good plan can be both specific and flexible. I believe the 1994 GMPA is a good and amply flexible

plan. I ask that in revising the GMPA plan, the Trust strive to retain the GMPA's specificity....")

Response TP-4 – In the GMPA, the NPS chose to develop a highly specific and prescriptive plan. Its prescriptive elements have not proved flexible enough to allow its efficient or smooth implementation and thus, in the short time since its adoption, both the NPS and the Trust have been forced to depart from the plan. Specific departures have included changes in building use such as the decision to use historic homes on O'Reilly Avenue for offices; the decision not to pursue a consolidated public safety facility, but to add an addition to the Presidio Fire Station instead; the decision to seek other uses for the LAMC and LAIR buildings when a health science research facility was determined to be infeasible within a reasonable amount of time; the decision to locate a maintenance facility towards the center of the Presidio Golf Course rather than at the clubhouse site; the decision to construct an 18-acre total marsh rather than a 30-acre marsh, and more. These changes more than anything else demonstrate the need for a more flexible plan, that can provide a reasonable vision of the future – including what is certain and what is not.

One of the primary factors that now distinguishes the Trust's needs from the 1994 GMPA is the need to consider economic and market possibilities in a new way; and the GMPA's restrictions on tenant type, prescriptive use of buildings, and underlying financial assumptions make that impossible, as described in the Purpose and Need Chapter of the EIS. The Trust needs to adopt a plan under which financial uncertainty can be managed; a plan with a high level of specificity and prescription would place unnecessary restraints on the possibilities to manage uncertainty successfully. For this basic reason, among others, the PTMP must be adaptable in a way that the 1994 GMPA is not.

The Trust agrees, though, that a good plan can be both specific and flexible, and the modifications made to the Final Plan in response to comments achieves this result. See Responses FL-2 and FL-5 for further discussion of how the Final Plan retains enough flexibility while adding both clarity and specifics.

TP-5. ***Identify Primary and Secondary Uses***

The Sierra Club and a few other commentors suggest how the Trust could achieve flexibility while offering increased specificity in the Final Plan. They suggest first that the Trust strike a balance between the need for flexibility and the public's need for certainty by identifying a single preferred use and secondary use for each building or building complex. They also suggest the Trust can achieve all the flexibility it needs by selecting and identifying in the plan a secondary use for specific buildings or groups of buildings if the primary use becomes unworkable or infeasible. Primary and secondary uses would be adopted after appropriate assessments are conducted and included in the EIS. Any concern by the Trust that this approach would affect the flexibility to achieve financial goals is described by the Sierra Club as not a valid assertion.

The NRDC suggests another means to achieve flexibility. That is, where the same use is identified in multiple planning districts, the Plan could be made more specific by identifying a preferred location and backup locations and by better identifying priorities within an area. They recommend that where it is unlikely that a use would be provided in multiple districts – such as a conference center use – the Trust should decide at which location it will first request lease offers for that use and state that preference in the Final Plan.

Response TP-5 – The Trust believes that there is utility in the suggestion made by NRDC and other commentors to better identify priorities when a use is provided in more than one district. The Trust has somewhat modified the approaches suggested, and instead of specifying a preferred location and backup locations across the board for all uses in all districts or preferred uses and secondary uses for all buildings, the Trust has combined the identification of priority locations with the identification of some-building specific preferences to achieve an overall increased level of specificity within the Final Plan. Specifically, the Plan now better identifies priority locations for lodging, cultural, educational, and residential uses.

With respect to conference uses, the Draft Plan identified conference use as a possibility in four districts, two priority locations at Fort Scott and Public Health Service Hospital, and provided little characterization of conference type uses. The Final Plan continues to allow conference use in several

districts but characterizes the use more clearly as accessory to or supportive of other uses such as educational, lodging, and office uses, rather than as a large stand alone conference center of the nature proposed at Fort Baker. This use is further clarified by identifying existing space in this land use category (e.g., the Golden Gate Club and the Officers' Club at the Main Post and the Log Cabin at Fort Scott). See also Response LO-3.

With respect to lodging, the Draft Plan identified lodging use as a possibility in three districts, but provided no preferred locations or buildings. The Final Plan identifies lodging as a preferred use in these three districts, quantifies the lodging square footage anticipated within each (i.e., up to about 64,000 square feet (sf) at Fort Scott; 137,000 sf at Crissy Field (Area B); and 51,000 sf at the Main Post), and identifies preferred sites (i.e., Pershing Hall at the Main Post and Stilwell Hall in west Crissy Field (Area B)). The Final Plan also provides better clarity about the nature of lodging. See the Lodging and Other Visitor Amenities section in Chapter Two of the Final Plan.

With respect to cultural and educational uses, the Draft Plan allowed these as potential uses in all but the South Hills district, aggregated the uses, and provided little specificity about the nature or location of this more than 900,000 sf of space. The Final Plan considerably enhances the level of specificity and clarity with respect to these two uses. Cultural use (about 530,000 sf) has been disaggregated from educational use (about 390,000 sf) and priority districts specified for each (Crissy Field (Area B) and Main Post for cultural uses and Public Health Service Hospital and Fort Scott for educational uses). Furthermore, 100,000 sf of existing building space already dedicated to cultural/educational use is specified (i.e., the Officers' Club at 35,000 sf, the Presidio Theater at 15,000 sf, the Post Chapel at 7,000 sf, the Herbst Exhibition Hall at 11,000 sf, Crissy Center at 12,000 sf, and the Park Archives and Records Center at 19,000 sf), leaving only 430,000 sf for specific uses to be determined in the future. Of this 430,000 sf, three existing buildings are identified as possible and preferred museum locations (the 100,000-square foot Commissary, the historic Crissy Field hangars, and Building 640, all at Crissy Field (Area B)). In addition, more specificity is provided with respect to housing. See the housing discussion in Chapter Two of the Final Plan and responses to comments on Housing for additional detail.

As described in the responses to comments above, providing greater specificity than that provided in the Final Plan would be misleading in the sense that it would suggest a level of certainty that does not exist. Even the suggestion that all buildings be designated one preferred and one back-up use, implies a level of certainty or decision-making that is not possible in many instances without site-specific investigations of the physical characteristics of buildings and spaces, and of the financial feasibility associated with rehabilitation and reuse. Where possible, such as with over 200 residential buildings and other examples cited above, use preferences have been articulated. To suggest the same treatment for all buildings is simply infeasible within a plan that will be implemented over 20 to 30 years.

4.9 HISTORIC RESOURCES (HR)

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Preservation and Protection of the NHLD

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Treatment of Historic Buildings

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HR-14. *Preservation of NHLD Status with Demolition and New Construction*

Balancing Resource Goals

HR-15. *Balancing Preservation and Financial Goals*
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Additional Studies/Information in EIS

HR-18. *Additional Studies*
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Consultation

HR-29. *Consultation with Ohlone*

PRESERVATION AND PROTECTION OF THE NHLD

HR-1. *Commitment to Protect the National Historic Landmark District*

Several historic preservation and environmental organizations, including the National Trust for Historic Preservation, the Fort Point and Presidio Historical Association, and San Francisco Architectural Heritage, as well as the NPS, express concern about the lack of a clearly stated commitment by the Trust to avoid adverse effects on historic resources of the Presidio National Historic Landmark District (NHLD). They request a stronger commitment to the application of the Secretary of the Interior's Standards for Rehabilitation, and that the Trust "should not tolerate any project that will impair the integrity of the Presidio as a NHLD." Commentors express concern about the Draft EIS conclusion for the Draft Plan Alternative that it could have "significant adverse effects on individual historic resources or the NHLD." The concern

for potential adverse effects, as stated in comments, is largely due to the Plan's unspecified proposals for building demolition and new construction. Commentors recommend that the PTIP and EIS should be amended to state that in considering proposed projects, avoiding such adverse effects will take precedence over meeting financial and other goals. Other commentors express the opposing view that "You need to only pick 50 historic buildings and demolish/neglect the rest if you ever hope the park to be profitable."

Response HR-1 – The Final Plan reflects a strong, clear commitment by the Trust to the protection of the NHLD, and the EIS analysis has been amended to indicate that the Final Plan Alternative would avoid adverse impacts affecting the status and integrity of the NHLD. The Trust commits to preserve the NHLD and will give the highest priority to actions that carry out the preservation, rehabilitation, and use of historic buildings and landscapes in accordance with the Secretary of Interior's Standards for the Treatment of Historic Properties (which includes the Standards for Rehabilitation). This commitment is stated throughout the Final Plan, and most explicitly in Chapter One: Preserving and Enhancing Park Resources, where the planning principles for cultural resources are found. As part of the re-organization of the Final Plan, in response to public comments and concerns about the Draft Plan, the section on cultural resources is the very first section in Chapter One. In addition, the PTMP's Chapter Four: Plan Implementation includes a more detailed discussion on future project implementation, public involvement, and agency consultation in decision-making. See Figure 4.3, which describes and illustrates the general process for public involvement anticipated for specific categories of planning and implementation activities. The Trust will ensure public review of proposed projects that have the potential to adversely affect historic resources and has entered into a Programmatic Agreement (PA) (Appendix D of the Final EIS) with the California State Historic Preservation Officer, the Advisory Council on Historic Preservation, and the NPS to identify the consultation and input process for projects that may affect cultural resources. The National Trust for Historic Preservation and the Fort Point and Presidio Historical Society are also signatories to the agreement.

The PTMP is a programmatic-level document and in most cases does not specify individual building and site treatments. Rather, it provides a framework and guidance for future decision-making. Where this policy framework specifies preservation of the NHLD, it cannot preclude the possibility that in the future individual projects may be proposed that would adversely affect individual historic resources. This is because the feasibility of rehabilitation and reuse (both physical and financial feasibility) of all buildings has not been thoroughly assessed, and because the Trust Act requires the Presidio Trust to consider demolition of historic buildings under certain conditions. For these reasons, and because specifics about building demolition and new construction beyond what is presented in the Final Plan are not known, the Plan commits to maintaining quantitative and qualitative standards, as well as providing processes for public involvement and for historic compliance consultation to help ensure protection of the NHLD status.

The Trust would comply with Section 110 of the NHPA, which states that a federal agency must "to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm" to a National Historic Landmark that may be directly or adversely affected by an undertaking.

Economics is one of the factors considered in the management of historic buildings for any federal agency. The Presidio Trust Act states that "Removal and/or replacement of some structures must be considered as a management option in the administration of the Presidio." Economic feasibility, or cost-effectiveness of rehabilitation and reuse, will not be the only factor used in deciding the fate of a historic building, however; it will be just one of many criteria used in the decision-making process. Other factors include the viability of constructive reuse, building condition, the amount of historic fabric or integrity of the building, and relationship to other plan objectives.

HR-2. ***Preservation of the Presidio's Unique and Historic Character***

Many commentors recognize that the Presidio is a national park of unique beauty, as well as a historic former military post of great importance to both the region and the country. Some commentors would like the Final Plan to state a commitment to maximum historic preservation of the Presidio's unique character. Other commentors request that the PTMP establish specific means to minimize adverse effects caused by new construction and reinforce existing character-defining features, express concern that the level of new construction

as envisioned by the Trust may threaten the NHLD or jeopardize the Trust's mandate to protect and preserve the park's historic and cultural values and character. Other commentors ask that the Trust keep the Presidio as is, except for selective removal of buildings with no historical or architectural merit to create more open space, and rehabilitation of the remaining buildings and preservation of the building exteriors to perpetuate the "look" of the Presidio.

Response HR-2 – The Final Plan articulates the preservation and protection of the park and its resources as the primary mission of the Trust, and is intended to ensure that the Presidio of the future will have much the same "look" and character as the Presidio of today. Chapter One of the Final Plan focuses on preserving and enhancing park resources that make the Presidio such a special place. These resources include not only the contributing structures to the NHLD but the historic landscape as well. The Trust's overarching aim will be to preserve and enhance the Presidio's resources and to provide a meaningful experience for park visitors. The planning principles presented in Chapter One of the Final Plan will guide the Trust's future actions and decisions regarding management of the Presidio's cultural, natural, scenic and recreational resources. With regard to the built environment, and to further the protection of the NHLD, an emphasis of the Trust's activities will be adaptive reuse of historic buildings. Rehabilitation of historic buildings will be guided by the Secretary of the Interior's Standards for Rehabilitation and the Guidelines for Rehabilitating Buildings at the Presidio of San Francisco. In addition, the Trust will ensure that any changes to a site near an historic building cluster that are made to accommodate new uses are compatible with the historic setting and protect the integrity of the designed landscape areas. Please refer to Figure 1.1 of the Final Plan, which illustrates designed landscape areas and historic buildings.

With regard to concerns about the amount of new construction and its effects on the integrity of the NHLD, Planning Principles 1 and 2 address the issues of protecting the NHLD while changes occur within the Presidio's cultural landscape, and offer guidance for compatible new construction. In response to public comments, the Final Plan has been modified to provide more information on new construction and why it might be proposed in the future. Non-residential new construction will primarily be undertaken as a means to encourage reuse of historic buildings – to enhance the function of existing historic buildings or to make their rehabilitation and reuse economically viable. Limited residential new construction would be considered to achieve plan objectives, such as housing Presidio-based employees. In all cases, new construction would replace building square footage that is removed. New construction may include building additions, an annex adjacent to an existing building, infill buildings set within an existing cluster of buildings, or stand-alone structures in developed areas. Also refer to Responses HR-11 and HR-13, as well as the responses to New Construction comments for more discussion of this subject.

With regard to concerns about the effect of new construction on the Presidio's character, the Final Plan states that new construction will only occur in existing areas of development and will be sited to minimize impacts on adjacent resources. New construction will be used to reinforce historic character-defining features of an area, and its design will ensure that the association, feeling, and setting of the significant elements and the integrity of the NHLD are protected. Chapter Three of the Final Plan includes the identification of key character-defining features of each planning district and planning guidelines that would form the basis for future changes, which may include new construction. The guidelines conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Coupled with the Final Plan's text about new construction, the Trust is also committed to a process for public input for projects involving new construction. Projects that involve any new construction beyond the most modest building addition will be subject to public notice, outreach and consultation, public "scoping," and public review of specific design guidelines and/or schematic design, as well as environmental documents, prior to any decision about whether to implement the project. Also refer to Responses PI-1, PI-2 and PI-10.

HR-3. ***Effectiveness of Planning Principles in Avoiding or Reducing Impacts on the NHLD***

Commentors, including environmental organizations and the NPS, express concern that impacts of new construction cannot be effectively reduced or eliminated because the planning guidelines of the Draft Plan are stated as discretionary rather than binding, the overall square footage cap established

by the Draft Plan can be exceeded, and the Secretary of the Interior (SOI) standards need only be met to the "maximum extent feasible." Concern was expressed that the Draft EIS contains no evaluation of the effectiveness of the planning principles, planning guidelines, and SOI standards in reducing or avoiding adverse impacts. The NPS further recommends that effectiveness of these provisions should be analyzed for all of the alternatives. A recommendation is made that the planning principles and planning guidelines should be adopted as mitigation measures. Lastly, a request is made that if the planning principles and planning guidelines are to be used to mitigate potential impacts, as stated in Table S-1 and in the Environmental Consequences section of the Draft EIS, the principles and guidelines need to be included in the EIS and assessed for effectiveness in protecting cultural resources and the NHLD status.

Response HR-3 – In the Final Programmatic Agreement (PA), the signatories, including the ACHP, SHPO, and NPS, acknowledged that PTIP is a programmatic document that presents a range of preferred land uses and is intended as a policy framework to guide the Trust's future activities. The PA states that the planning principles and planning guidelines conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties and will be a means for assessing the effects of future projects in individual planning districts and the overall NHLD. "The Trust shall ensure that future planning documents conform to the Standards (SOI), the Principles, and any applicable Planning District Guidelines to the maximum extent feasible" (PA, Sec. X, A.). A process for review and consultation of future planning projects that may have an adverse effect on the NHLD is also set forth in the PA.

For clarification regarding the Standards for Rehabilitation, it should be noted that the preface to the standards state "the following (standards) are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility" (Secretary of the Interior's Standards for Rehabilitation). It is the interpretation of this preface that supported the Draft Plan's statement that the standards need only be met "to the maximum extent feasible," acknowledging that in some cases of rehabilitation the standards may for one reason or another not be met. However, in response to the concern raised, the language "to the maximum extent feasible" has been removed from the Final Plan when used in conjunction to the application of the standards, though the phrase remains in the Final PA as cited above.

In response to public comments, the cultural resources section of the Final EIS has been expanded to include a district-by-district description of actions proposed under each alternative, including the maximum allowable demolition and new construction. As requested, a discussion of the planning principles and planning guidelines is also provided. Please refer directly to Section 4.2.1 (Historical Architectural Resources and the Cultural Landscape). Consistent with the commentor's suggestion, conformance with the planning principles and planning guidelines is required by Mitigation Measure CR-4 (as presented at the end of Section 4.2.1 of the Final EIS).

TREATMENT OF HISTORIC BUILDINGS

HR-4. ***Demolition of Historic Buildings***

Commentors request that the PTMP as well as the PA make a commitment that no building or structure listed as part of the National Register nomination would be demolished. Commentors are concerned that the potential for demolition of historic buildings could jeopardize the integrity of the NHLD and that minimizing demolition would help preserve archeological resources, historic buildings and sites, and the Presidio's unique character. Some commentors feel that the only historic buildings that could justifiably be removed are those listed in the 1994 GMPA. The Council on America's Military Past expresses concern over the statement in the Draft Plan that "Through future planning, the Trust may identify compelling reasons for removing some buildings that contribute to the NHLD" and that no such removal can be justified. Commentors suggest that since all of the Draft EIS alternatives meet the stated financial requirement of the Presidio Trust Act, no removals of historic buildings or structures other than those in the 1994 GMPA can be justified. Others acknowledge that although the Trust Act does have provision for reviewing historic structures for demolition, the Trust is still required to adhere to the NHPA and evaluate the effect of further demolition on the integrity of the NHLD.

Response HR-4 – The language of the Final Plan reinforces the Trust's commitment to the preservation of the integrity of the NHLD. The very first

planning principle in Chapter One states "Protect the historic character and integrity of the NHLD while allowing changes that will maintain the site's vitality. Rehabilitate historic buildings compatibly for adaptive and feasible uses." However, the Presidio Trust Act does include language that states "Removal and/or replacement of some structures within the Presidio must be considered as a management option in the administration of the Presidio." For this reason, the Final Plan cannot preclude the possibility of demolition in the future. The PA lays out a consultation process with agencies and interested parties for any such future proposed action in compliance with the NHPA. Chapter Four of the Final Plan also describes the public input and additional analysis required before demolition could occur.

While the Trust commits to minimizing any demolition of historic buildings, and has strengthened its commitment to preserve the NHLD, there is the possibility that at some point in the future the Trust may consider the demolition of some historic buildings. When considering historic building demolition, the Trust will base its decision on other resource values (such as preservation of an adjacent resource or rehabilitation of an historic setting) and criteria such as historic and architectural significance, integrity, cost-effectiveness of rehabilitation, feasibility of reuse, and other plan objectives. Refer also to Response HR-6. One potential example is the retention or potential removal of Buildings 40 and 41, World War II temporary barracks at the Main Post that are right in the middle of the historic archeological resource, El Presidio. Many members of the public have suggested that these buildings should be removed in order to allow for the preservation and interpretation of El Presidio. See Response PG-16. The Trust will also consider alternatives to full demolition, such as relocation or partial demolition with some new construction.

The Council on America's Military Past's specific citation from the Draft Plan has been modified in the Final Plan to read, "The Trust may, at some time, find compelling reasons for allowing historic and non-historic building removal, building additions, or other new construction" (Planning Principle 2, first paragraph). For any potential removal of a contributing building, the Trust would be subject to Section 106 of the NHPA as well as NEPA, and would provide for public input in the decision-making process. Please refer to Chapter Four of the Final Plan for a discussion on public involvement with future actions.

HR-5. ***Commitment to Adaptive Reuse of Historic Buildings over New Construction***

Commentors request that Trust make a clear commitment to adaptive reuse of historic buildings over demolition or new construction. Commentors suggest that a full range of options to reuse, which may include allowance for building additions, interior renovations, or relocation of structures, be considered before demolition or new construction. The National Trust for Historic Preservation requests that the Trust make a clear commitment to, rather than just an "emphasis" on, evaluating historic structures for adaptive reuse, and that if reuse in conformity to the SOI standards is not feasible, other options short of demolition be evaluated. These evaluations should be made available to the public. The concern is that, as implied in the Draft EIS, if buildings cannot be rehabilitated in accordance with the standards, demolition would be the only other option. Both the NPS and the National Trust request that, in order to protect and preserve the integrity of the NHLD, the Trust consider demolition of historic buildings only as a last resort and only on a case-by-case basis.

Response HR-5 – In response to public comment, the Plan has been strengthened to articulate the Trust's commitment to the preservation of the Presidio's NHLD status. In addition, Chapter One of the Final Plan states that the Trust will make every reasonable effort to adapt historic buildings to new uses, and that in cases where new construction is considered, it will primarily be to encourage the reuse of historic buildings. An example would be the construction of an addition to an historic building, or an adjacent annex, in order to make the rehabilitation of the historic building economically feasible. The Plan also now states that the Trust will undertake as little new construction and as little demolition of historic buildings as possible, and will solicit input from the public, as well as historic preservation agencies, in the decision-making process.

As suggested by the commentors, the Plan does allow that a full range of options to demolition of historic buildings be considered. As described under Planning Principle 2, these options include building additions, relocation, or

partial building demolition coupled with some new construction; they could also include significant alteration to a building's interior to accommodate a new use or rehabilitation that is not wholly consistent with the SOI standards.

The decision-making process for these building treatments will be on a case-by-case basis and will be multi-faceted, not based solely on the cost-effectiveness of rehabilitating a building to meet the Secretary of the Interior's standards. Factors to be considered will include historic and architectural significance, building integrity, economic feasibility of rehabilitation, and feasibility of reuse, among others. Also see Response HR-6 below. Chapter Four of the Final Plan provides details about the Trust's commitment to public participation in decision-making on future actions that include historic building demolition and new construction. Demolition of historic buildings will be subject to public notice, outreach, and consultation with historic preservation agencies (as stipulated in the Programmatic Agreement), as well as public review of environmental documents prior to any decision to implement the project.

HR-6. ***Concept of Feasibility for Reuse***

The National Trust for Historic Preservation requests that the Trust define the meaning of "cost-effective" and "feasible" in the evaluation criteria applied for building reuse. Specific references were made to the Draft Plan's Planning Principle 5 (Building Management). The concern is that there should be a measurable standard for assessing cost-effectiveness, taking into account building codes and economic incentives for historic buildings, and that profitability should not be the overriding deciding factor. The National Trust also indicates that a record of individual building assessments should be available to the public and that in no case should preservation of historic resources be subordinated to financial considerations. The Council on America's Military Past asks the Trust to delete Planning Principle 5 from the Draft Plan because it violates the GGNRA and Trust Acts.

Response HR-6 – The terms "cost-effective" and "feasible" are used in their common sense, and both convey Trust Act requirements and imply careful consideration before decisions are made regarding specific building treatments. Consistent with the Final Plan, detailed building-specific analyzes would be required before it is determined that an historic building can or cannot be rehabilitated and revised. These analyses would necessarily include an assessment of physical feasibility, a cost estimate and comparison to projected revenues, and consideration of other strategies to preserve and reuse the buildings. Evaluation criteria would be tailored to the specific circumstances. Profitability, or cost-effectiveness, of a building's rehabilitation will not be the only criteria used in determining a building's fate. A variety of criteria and resource values will come into play when the Trust must decide whether a historic building will be demolished or not. The language cited in the planning principle (Planning Principle 5 in the Draft Plan and Planning Principle 2 in the Final Plan) is a direct quotation from the Presidio Trust Act, which states that the Trust must consider "demolition of structures which in the opinion of the Trust, cannot be cost-effectively rehabilitated…" The text that follows the planning principle has been modified, however, to clarify the intent and decision-making process for historic building demolition. Chapter Four then explains the financial challenges and context in which the Trust would be making these decisions, and includes a description of the public involvement process for such projects. Finally, the Trust recognizes that tenants may not be found immediately for all of the buildings targeted for rehabilitation; however, this alone will not warrant demolition. In such cases, the Trust will look to "mothball" or stabilize these historic buildings until such time as a tenant is found. Also see Responses HR-5 and HR-7.

HR-7. ***Building Stabilization and Ongoing Maintenance***

Several historic preservation organizations comment that the Trust should commit to immediate stabilization and ongoing maintenance of unused and deteriorating buildings that contribute to the NHLD, as stipulated in Section 110(a)(2)(B) of the NHPA. The National Trust for Historic Preservation suggests that the planning principles be amended to make this commitment. There is concern about the visible deterioration of a number of historic buildings with architectural significance, and that stabilization and maintenance now will save money in the future when the buildings are rehabilitated. Another suggestion is made for the Trust to "mothball" buildings, rather than demolish them, until such time that they can be reused.

Response HR-7 – The Trust agrees that a maintenance program for mothballing buildings will help preserve the historic buildings. As explained in Mitigation Measure CR-3 in the Final EIS (Section 4.2.1), the Trust is developing a cyclical maintenance program to prevent damage to historic fabric and ensure that buildings are well maintained until such time as they are rehabilitated and occupied. This program will include guidelines for mothballing, preserving, and monitoring vacant buildings, and will include directives for physical inspections and routine monitoring for deterioration. If deterioration is then identified, actions will be taken to arrest further impacts. Clearly, one of the Trust's priorities for short-term implementation activities following the adoption of PTMP will be long-term leasing and rehabilitation of currently vacant historic buildings.

HR-8. ***Delay of Long-Term Leasing until District Planning is Completed***

The NPS recommends that long-term leasing be delayed until district planning is completed. The concern is that the Draft EIS describes opportunities for a range of actions following the adoption of the Final Plan that will not require public review, including proceeding with long-term leasing of historic and non-historic structures and other projects. An additional concern is that the Plan identifies preferred land uses for each district rather than designated land uses. The NPS believes that a subsequent planning process is needed to provide enough information to determine the effect of long-term leases and specific uses on the overall development of districts and the park. In addition, commentors note that long-term leasing may proceed right after PTMP is adopted, stating "certain non-historic structures may be quickly leased and become unavailable to the pool of non-historic buildings that could be considered for demolition as mitigation to offset adverse effects to the NHLD."

Response HR-8 – The Trust cannot refrain from long-term leasing if it is to attract tenants willing to invest substantial resources in the rehabilitation and reuse of historic structures. Sufficient detail is provided in the Final Plan Alternative, and has been analyzed in the EIS, to allow leasing of historic and non-historic structures without further Presidio-wide or district level planning. In each district, preferred land uses are identified, and parameters are set by planning district guidelines. Also, consistency with the PTMP is one of the tenant selection criteria that will be used, and public notice of leasing opportunities will be provided. See Chapter Four of the Final Plan and Response TS-9. The commentor's distinction between "preferred" and "designated" land uses is unclear, and the suggestion that additional planning is needed to determine the effects of long-term leases is unsupported. Preferred uses are those the Trust will seek out. If the preferred use cannot be satisfied (e.g., because the marketplace may not deliver the preferred use) other uses designated for the planning district could then be sought. The mix of uses allowed in each district has been fully analyzed in the EIS, so that selection of a use consistent with the allowable mix, the scope of the environmental analysis, the tenant selection criteria and other guidelines will satisfy the leasing and environmental review process. The EIS alternatives consider a range of possible land uses and land use intensities, and the EIS fully analyses the effects of these possibilities on traffic, air quality, historic resources, and many other aspects of the environment.

Long-term leases for historic buildings would be used in circumstances where a tenant would provide the financing and a long-term lease is required to amortize the costs invested in rehabilitation. The Plan has been amended to clarify the intent behind long-term leasing. See Chapter Four of the Final Plan. The Plan identifies one exception to its provisions for long-term leasing, and that is a study area within Crissy Field where options for the potential for marsh expansion are being evaluated. This detail was added to the Final Plan in response to concerns raised by the NPS. The Final Plan provides that no new construction or long-term leasing in the immediate study area will be undertaken for the next two years (the approximate duration of the study).

For each of the planning districts, the Final Plan provides a district concept, preferred land uses, maximum amount of square footage, levels of demolition and new construction, and planning guidelines. This information sets the framework for implementation activities, including both leasing and site-specific planning. In order to achieve the mandate of self-sufficiency by 2013, the Trust must continue focus on leasing buildings and rehabilitating historic buildings to preserve their integrity. The PTMP is a programmatic-level document and therefore does not specify individual building or site treatments. Assumptions about land use by district were made for purposes of

the impact analysis of the EIS and follow the PTMP's direction for preferred land use designations.

Before undertaking projects that involve building demolition, new construction or significant changes to the Presidio's historic landscape, the Trust will solicit public input and conduct detailed studies and appropriate environmental analysis as part of the decision-making process. For those non-historic buildings that are slated in the PTMP for eventual removal (namely the Wherry Housing complex, and some other non-residential housing), a generalized timeline is included. See Chapter Four, Figure 4.2B, Long-Term Implementation: Generalized Timeline. Other non-historic buildings may be leased (either through short-term or long-term leases) to generate revenue or achieve other plan objectives. In no way will leasing of non-historic buildings alter the Trust's commitment to the rehabilitation and reuse of historic buildings, or make the task any more difficult than it already is. To the contrary, non-historic buildings may be leased for higher rents because they require fewer improvements, thus generating revenues necessary to undertake historic rehabilitation or natural resource enhancements.

HR-9. ***HABS vs. National Register of Historic Places Evaluation***

A recommendation of many historic preservation organizations, as well as the NPS, is that the Trust should use the 1993 update of the Presidio NHLD nomination form as the base document for determining which historic structures contribute to the NHLD. The concern is that the HABS report has no basis in preservation law in that it was prepared for maintenance purposes and not for ultimate preservation decisions. "Although the 1985 HABS report is required by the Trust Act to evaluate whether the historic structures are economically viable for rehabilitation… use of the 1993 update would allow a reasoned, comprehensive assessment of impacts to park resources and would strengthen the Trust's commitment to preservation of the NHLD." Commentors note that while the HABS survey is specifically referenced in the Trust Act, it should not be the sole source for historic resource evaluation. Instead, the National Register nomination form should be used to determine what is significant and what is not. Several commentors note that the removal of NHL contributing structures (based upon the 1993 NHL update) may adversely affect the NHL designation, no matter what category the structures are listed under in the HABS report. Finally, the NPS asserts that "Rather than reuse historic structures, the Presidio Trust is assuming removal of structures [pursuant to the study of economic feasibility of rehabilitation based upon the 1985 HABS report] that don't meet [as yet] undisclosed financial feasibility criteria and using the square footage to construct new structures."

Response HR-9 – The Trust agrees that the 1993 National Register Nomination Update form is the documentation of contributing and non-contributing features to the NHL status of the Presidio. The Trust will use this inventory as a baseline, balanced with other factors, for determining the significance of individual resources and the integrity of the overall district. The Trust identified the 1985 Presidio of San Francisco Historic Landmark District Historic American Buildings Survey (HABS) report in the Draft Plan because Congress specifically refers to it in the Trust Act. The Trust acknowledges that the 1985 HABS report was prepared for a purpose that is separate and distinct from that of the National Register form. The Presidio Trust Act requires the Trust to consider, for possible demolition or replacement, those buildings identified as Categories 2 through 5 in the HABS report. The Trust considers this section of the Trust Act to indicate the universe of buildings that must be evaluated, and not the criteria that must be used. As described elsewhere, many criteria will be factored into the decision-making process regarding individual building treatments. See Response HR-4. These factors will include criteria such as historic and architectural significance, integrity, cost-effectiveness of rehabilitation, feasibility of reuse, and relationship to other resource values and goals.

The Trust concurs with the comment that the removal of a contributing structure may have an adverse effect on the NHL. Thus, the PA outlines a process for review and consultation for any proposed demolition of an historic property within Area B. In addition, as stated in the Final Plan, demolition of historic buildings will be subject to public notice, outreach and consultation, public scoping, and review of environmental documents prior to any decision to implement the project.

HR-10. ***Preservation of Less Visually Appealing Historic Structures***

The Council on America's Military Past comments that the Trust should give thoughtful care and attention in management and planning for the Presidio's

industrial and warehouse-type buildings. "Historical significance does not necessarily equal architectural distinction or appealing and attractive appearance. Some of the rarest buildings at the Presidio are the warehouses and storehouses and aircraft hangars and shops, and other buildings of an industrial character…a whole streetscape of warehouses is even rarer."

Response HR-10 – The Trust concurs that the diverse mixture of architectural styles and periods of construction of the buildings contribute to the Presidio's status as a NHLD. While many of these buildings in and of themselves may not seem significant, it is when they are viewed in the context of a district that they are understood as contributing to the NHLD as a whole. Many utilitarian buildings are essential facilities for operating the Presidio today, while others, such as the Gorgas and Mason Street warehouses, are popular for leasing. One current example of reuse of an industrial building for a contemporary need is the proposed water recycling plant in Buildings 1040 (former powerhouse and steam plant) or 1063 (medical supply warehouse) at the Letterman Complex. The Trust is committed to preserving the Presidio's diversity of building types, an important, character-defining feature of the NHLD.

NEW CONSTRUCTION

HR-11. *Minimizing New Construction*

Several environmental organizations and the NPS believe the Trust should carefully plan and keep new construction to a minimum to ensure the integrity of the NHLD. They voice concern about the Draft Plan's proposed level of demolition and new construction, particularly in historic areas, and its potential to impair the integrity of the NHLD. The NPS states that "As a result, infill actions must be carefully planned and only pursued when they achieve goals central to the Presidio's national park values, such as open space expansion, and do not negatively impact the park's historic landmark status." The Council on America's Military Past believes "…one of the significant aspects of the Presidio is the relationship of one building to another and one subdistrict to another and their historic setting and historic scene and cultural landscapes." Commentors note that while there may be a few places where infill construction may be appropriate, inserting new construction in sensitive historic settings (such as Fort Scott and the Main Post) would have an adverse effect on the NHLD. Some commentors indicate that it would be preferable to locate new construction where non-historic groups of buildings are to be removed.

Response HR-11 – In response to concerns raised about new construction, the Plan has been modified in several ways. In Chapter One of the Final Plan, under the planning principles, language has been added to state that the Trust will undertake as little new construction and as little demolition of historic buildings as possible. The Trust will also make every reasonable effort to adapt historic buildings for new uses. In cases where the Trust considers non-residential new construction, it will do so primarily to encourage the reuse of adjacent historic buildings. In addition, the Final Plan cites examples of new construction to explain the form that new construction may take – a building addition, an annex adjacent to an existing building, infill construction within an existing building cluster, or a stand-alone structure in a developed area. These issues are discussed further in response to comments on new construction.

The Final Plan includes more descriptive text about where demolition and new construction may occur, by planning district. The text also clarifies the constraints on new construction that would ensure that its impacts are minimized. In Chapter Three, a maximum level of new construction and demolition is included for each planning district. New construction can only occur in previously developed areas and must be sited to minimize impacts on cultural and natural resources. The planning principles and planning guidelines (which conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties) together set the framework for consideration of any new construction proposed in the future, and provide a means to minimize adverse effects upon the NHLD. Also refer to Response HR-14 below. Every effort will be made to avoid an adverse effect on the NHLD, and the status of the NHLD will be protected. Chapter Four describes the public involvement process that the Trust anticipates for projects involving demolition and new construction. Future site plans will locate new facilities and discuss environmental consequences of specific actions and alternatives. Site-specific evaluations of new construction will consider building height, site design, building separation, architectural form, and articulation in relation to adjacent historic patterns of development. The design of new construction

will ensure that the association, feeling, and setting of the significant elements and the integrity of the NHLD are protected.

Lastly, it is expected that most replacement construction would occur in areas where non-historic buildings are removed. As an example, at the Letterman Complex, one of the non-historic dormitories may be removed and replaced with more compatibly designed and more efficient housing. In other cases, however, the Final Plan commits to the restoration of open space and natural habitat through the removal of non-historic housing (namely Wherry Housing, some of the non-historic housing on West and East Washington Boulevard and in the East Housing district), rather than replacing these buildings with new construction.

HR-12. ***Effect of Square Footage Cap on Demolition of Historic Buildings***

The National Trust for Historic Preservation and several others indicate that the Trust should not use an artificial cap on overall square footage as a justification for demolition of historic buildings and new construction. They make specific reference to the Draft Plan's goal to reduce the overall square footage for Area B to 5.6 million from its current 5.96 million. The National Trust's fear is that demolition of an historic building might be proposed in order to make room (under the overall square footage cap) for more lucrative new construction. Therefore, they recommend that new construction in the Final Plan be reduced in lieu of demolition.

Response HR-12 – In response to comments and concerns about the Draft Plan's language about the square footage cap and building demolition, the Plan has been amended and language strengthened. The Final Plan states that "over time, the Trust will decrease the building area in Area B from the current 5.96 million square feet to 5.6 million square feet or less." This will be a net reduction of about 400,000 square feet. The cap on the reduced square footage is not a justification for demolition of historic buildings and an allowance for new construction. The majority of proposed demolition is in non-historic housing clusters (namely Wherry Housing, some of the West and East Washington Boulevard housing, and non-historic housing in the East Housing district, which make up 680,000 square feet of the proposed maximum demolition).

The Final Plan does allow for some new construction consistent with concepts presented in the Draft Plan. However, language has been added to the planning principles in Chapter One to state that "The Trust will undertake as little new construction and as little demolition of historic buildings as possible..." New construction would most likely take the form of replacement housing, and as a means to encourage rehabilitation of historic buildings. New construction will only occur in previously developed areas and may take the form of a building addition, an annex adjacent to an existing building, infill buildings within an existing cluster, or as a stand-alone structure. The Final Plan provides more detail than the Draft Plan did with regard to building demolition and replacement construction by planning district. Demolition and/or new construction will be subject to additional planning, analysis, and public input in conformance with NEPA and NHPA.

New construction is not necessarily a lucrative proposal, as the commentor has implied. The Trust's priority for implementation in the near term will be to rehabilitate existing buildings, thereby generating revenue to fund subsequent capital improvements and operating expenses. Building demolition comes with a cost – it requires the capital monies to fund the demolition and also results in reduced revenue while the square footage is taken off line from leasing. The Trust will therefore have to balance and phase proposed demolition and new construction carefully in light of the Plan's financial goals. In some cases historic building rehabilitation may be easier to finance when packaged with new construction. Because new construction would generally occur under a ground lease scenario, it would result in relatively lower annual rents to the Trust than space that is rehabilitated directly by the Trust. This topic is discussed further in response to other comments on new construction.

The maximum amounts of demolition and new construction within the Final Plan are maximums only. Through the course of implementation, the Trust will monitor its progress toward achieving financial self-sufficiency and completing the capital program. Based on this progress, the PTMP's figures for demolition, new construction, and the overall square footage cap may be reduced.

HR-13. ***Construction of New Housing***

The NPS and several other commentors are concerned that there is the potential for an adverse effect on the NHL through the construction of new housing as allowed by the Draft Plan. They feel that new residential construction in historically sensitive areas will adversely affect the character of the Presidio as a whole. Commentors also are concerned that that they cannot fully understand the potential impacts of new housing construction proposed in the Draft Plan since it does not specify sites for new construction. They ask that the Plan be amended to make clear that implementation of the Trust's housing policy will not adversely affect the NHLD and the Trust's historic preservation goals. One commentor expresses concern that the non-historic housing proposed for removal in the Draft Plan might never be removed, even after new replacement housing is built and occupied, because of its economic value.

Response HR-13 – In response to comments, the Final Plan provides more detailed information about housing than the Draft Plan. See Chapter Two of the Final Plan. Housing, that replaces units removed to restore open space and natural habitat would in many cases be located within existing buildings; this replacement housing would be created either by dividing large units into smaller units or by converting non-residential space to residential use. New residential construction would be limited, would not be permitted to adversely affect the overall status of the NHLD, and would proceed only after additional planning, public input, and environmental analysis. The Final Plan now identifies two areas where non-historic housing may, in the future, be removed and replaced with more compatibly designed housing. These are at the Letterman Complex (where Building 1028 currently exists) and at North Fort Scott, behind Pilots Row. These proposals would be subject to additional planning, analysis, and public input; the PTMP's planning principles and planning guidelines would set the framework for the design of any new construction. See responses to Housing and New Construction comments for more information on new construction and impacts on the NHLD, and Responses PI-1, PI-2, and PI-10 for information on future NEPA and NHPA review and public involvement.

Any new construction would likely coincide with the removal of non-historic housing to replace lost revenues from the removed housing. To allow new construction, the Trust must remove existing square footage as an offset so that total building area in the park will not exceed today's 5.96 million square feet. In the instance of Wherry Housing, it may be necessary to build replacement units before offsetting space is demolished, but subsequent removal would be an irrevocable commitment once the replacement units came online.

HR-14. ***Preservation of NHLD Status with Demolition and New Construction***

The NPS comments that the Final EIS should include a mitigation stating "that all new construction and demolition will be proposed in a manner that assures the preservation of the integrity of the NHLD." The NPS recommends that those projects that cannot meet this standard be modified until the standard can be met, or else removed from further consideration.

Response HR-14 – The Trust concurs with the NPS recommendation, and has integrated this language into a mitigation measure in the Final EIS that was taken from the GMPA. See Mitigation Measure CR-4 in Section 4.2.1. The Trust is committed to the preservation and protection of the NHLD, as stated very clearly throughout the Final Plan. Under the NHPA, the Trust is required to seek ways to avoid, reduce, or mitigate the effects on historic properties. The Programmatic Agreement outlines the review and consultation process to achieve this goal, and states that the Trust will ensure that future planning documents conform to the SOI standards, the planning principles, and the planning guidelines. There may be cases in which a proposed action would have an adverse effect on an individual historic structure or a landscape setting; however, the action alone would not necessarily threaten the overall integrity or status of the NHLD.

BALANCING RESOURCE GOALS

HR-15. ***Balancing Preservation and Financial Goals***

A number of commentors are concerned that the Trust will place more weight on meeting financial and other goals described in the EIS than on avoiding

adverse effects on the NHLD. A form letter states: "The Final Plan must not only control costs but also protect park resources far better than the preferred Plan does." Commentors believe that the amount of development proposed in the Draft Plan is not needed to make the Presidio self-sufficient and would jeopardize the goals of protecting the park's resources. They request that the EIS and the planning principles be amended to state a firm commitment to the avoidance of adverse impacts on individual historic resources as well as on the NHLD, and that the Trust find ways to attain financial sustainability without compromising its mandate to safeguard the Presidio's park resources.

Response HR-15 – In response to comments, the Plan has been amended to emphasize resource preservation and public use, and to clarify that financial self-sufficiency is merely a condition or requirement that must be met. The Presidio Trust is committed to the preservation and protection of the integrity of the NHLD. This is stated very clearly in the Final Plan, and discussed in detail in Chapter One of the Final Plan. The Trust does face strict financial performance standards, but the means for achieving these will not sacrifice the NHLD.

Clearly the availability of funding will determine when park resources can be rehabilitated and enhanced. The Final Plan speaks to the need to control costs by reducing overall operating expenses, and states that the Trust will set priorities for projects that are needed to (1) safeguard significant park resources; (2) preserve historic buildings, generate revenue, or reduce costs; and (3) finance preservation of buildings and landscapes, or enhancement and expansion of open spaces. See Chapter Four of the Final Plan.

The Final Plan does not "propose" development; instead, it proposes increased open space and decreased building space. New construction would be allowed, but only to replace building space that is removed, and only within quantitative, qualitative, and procedural constraints articulated in the Final Plan. The EIS alternatives include a range of possible square footages, and various amounts of new construction, allowing a comparison of potential impacts.

HR-16. ***Balancing an Increase in Open Space with Preservation Goals***

A number of commentors feel that the Trust should not increase open space to the detriment of individual historic resources or the integrity of the NHLD. Historic preservation groups express concern that the Draft Plan's goals for increasing open space through the removal of non-historic buildings, and a built environment with 5.6 million square feet achieved through replacement construction of some of the square footage demolished, would result in an adverse effect on the integrity of the NHLD. Specifically, they state "the proposed demolition of buildings to increase open space such as in the Public Health Service Hospital, East Housing and South Hills districts, and restriction of new building development to the Main Post, Fort Scott and Crissy Field is a potential threat to the integrity of the NHLD." Their concern centers on the Trust's commitment to increase open space, which is not stipulated by the Trust Act, and the proposal to allow new construction (replacement square footage) in "historically sensitive areas" of the Presidio such as the Main Post.

Commentors are also concerned that there is a bias toward doing something that is not stipulated by the Trust Act (increasing open space) at the cost of violating preservation law (which the Trust is required to follow) by allowing new construction that may impair the NHLD. They state that the emphasis should be on preserving historic resources and preserving open space. Another group of commentors recommends demolishing historic buildings to increase the amount of open space. Lastly, one commentor adds that there should be no expansion of Crissy Marsh and no effort to restore Tennessee Hollow, as these actions would destroy historic resources and values of the Presidio.

Response HR-16 – The Presidio Trust is committed to the preservation and protection of the Presidio's NHLD status. In addition to protecting the NHLD status, the Trust puts forth other resource preservation and enhancement goals in the PTMP that are consistent with the General Objectives of the GMPA and consistent with sound land use planning for a national park setting. These resource goals include the enhancement of natural resources and an increase in open space, but not at the expense of the NHLD. Chapter One of the Final Plan sets forth the planning principles that will guide the protection and enhancement of the Presidio's park resources, and the balance of the Plan

reiterates the Trust's priority on the rehabilitation and reuse of historic buildings at the Presidio. In addition, as stated in Chapter Four, "the Presidio Trust's success will be measured largely by the timely rehabilitation and reuse of the Presidio's historic buildings and landscapes, the quality and quantity of open spaces that are created or enhanced, and the extent to which these accomplishments and the park resources they address are understood and enjoyed by park visitors."

The Final Plan calls for a reduction in built square footage, from 5.96 million to 5.6 million, over time. Within this context (overall decrease in building space), the Final Plan allows for some new construction to occur to encourage the reuse of historic buildings and to achieve other plan objectives. The increase in open space and decrease in building space are linked to the phased removal of Wherry Housing. The maximum amount of new construction within the Crissy Field planning district has been reduced in the Final Plan. Any future proposals for new construction would be required to be consistent with the planning guidelines, which are consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, and would be subject not only to public review but consultation with historic preservation agencies as stipulated in the Final PA.

The Trust's priority for implementation will be on those near-term capital improvements that generate the revenue to fund subsequent capital improvements and operating expenses. The rehabilitation and leasing of historic structures consistent with the Plan and the SOI standards will be a priority upon adoption of the PTMP. Refer to Chapter Four of the Final Plan. With regard to one commentor's concerns about the proposed enhancements to Crissy Marsh and Tennessee Hollow, these proposals will be subject to additional planning, design, and analysis prior to implementation. As part of that process, an assessment of alternatives and effects on park resources, including cultural resources, will be conducted. Chapter One of the PTMP addresses the need for balancing resource needs and potential conflicts between planning principles that may arise. In any event, final designs for these two projects will not be at the expense of the overall status or integrity of the NHLD. Also see Response HR-12.

HR-17. ***Balancing Cultural and Natural Resource Restoration Efforts***

The USFWS recommends that the PTIP evaluate the impacts of restoration-related activities, and impacts of development, on cultural resources in an equitable manner. As an example, the preservation and interpretation of the historic Marine Cemetery at the PHSH would be highly compatible with protection and enhancement of existing natural resources in the same area. Thus, the commentor believes that opportunities for maximizing integrated conservation of natural and cultural resource values should be identified and would be appropriate for comparison of NEPA alternatives.

Response HR-17 – The PTMP and Final EIS are programmatic-level documents, and therefore do not assess site-specific actions, such as interpretation of the Marine Cemetery, although Chapter Three of the Final Plan calls for the cemetery's protection and commemoration while also providing for restoration of native plant habitat in the PHSH district. With regard to the effects of site restoration and vegetation management actions on cultural resources, the Final EIS assumes the implementation of the approved Vegetation Management Plan (VMP) and Environmental Assessment (EA) (except as noted in individual alternatives). The VMP EA included a comprehensive assessment of potential effects on cultural resources, and the Final Plan defines measures for environmental protection specific to protecting contributing elements of the NHLD. As site-specific vegetation restoration plans are developed to implement the VMP and the PTMP, they will be evaluated for their effects on cultural resources, and the Trust will strive to maximize integrated conservation of natural and cultural resources wherever opportunities arise.

ADDITIONAL STUDIES/INFORMATION IN EIS

HR-18. ***Additional Studies***

Two commentors assert that the Plan and EIS should include a provision for continuing evaluation of Presidio resources to determine whether they are historic and contributing to the NHLD, as required under Section 110 of the NHPA. Since the NHL update was completed in 1993, additional structures are now 50 years old and should be evaluated. Specifically, the historic building studies should include an updated Cold War inventory, as was

conducted recently for the Doyle Drive Environmental and Design Study. The commentor also recommends that physical history reports be used to inform future actions involving historic structures.

Response HR-18 – Evaluation of the Cold War history of Presidio buildings has already been completed and need not be re-done. See Response HO-13. In addition, the Programmatic Agreement contains specific language regarding the need for ongoing identification of historic properties, for those not previously listed or determined eligible for listing on the National Register. "Evaluation of buildings or structures which may become 50 years old or may have achieved exceptional significance while this Programmatic Agreement is in effect shall be conducted within the framework of the 'statewide Historic Buildings and Structures Inventory, Dept. of Defense Installations, State of Ca., Vol.103' and the 'National Register of Historic Places Registration Forms for the Presidio of San Francisco National Historic Landmark District (1993)'." The Programmatic Agreement includes a process for the identification and listing of properties, including archeological properties.

HR-19. ***Preservation of Contributing, Small-Scale Features***

Two commentors recommend that the Trust commit to future planning for the preservation and interpretation of the fortifications and cultural landscape features that contribute to the NHLD. One of the commentors expresses concern that all of the small-scale features of the Presidio, which also contribute to the NHLD, are not mentioned in PTIP and should not be ignored. As an example, the commentors note that no historic streets should be demolished, removed, or buried, although their closure to cars would be acceptable.

Response HR-19 – The Trust recognizes that contributing features of the NHLD include more than just historic structures. Planning Principle 1 in Chapter One of the Final Plan addresses the protection and preservation of the NHLD, including the Presidio's cultural landscape (which encompasses many of the commentor's noted small-scale features). In addition, the planning guidelines in Chapter Three describe the NHLD's character-defining features and are organized by cultural landscape components (consistent with The Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes). These features include roads and circulation systems. Future site-specific designs and planning will study the treatment of these small-scale features in greater detail and will be sensitive to the potential effects on the historic resources. The EIS includes a program-level assessment of potential impacts to the Presidio cultural landscape.

HR-20. ***List of All Contributing Resources***

Two commentors request that additional information about the Presidio's historic resources be included in the Final Plan and EIS. One of the commentors specifically requests a listing of all historic buildings and structures, including roads, that are listed in the 1993 NHLD National Register form and also asks that the locations of historic buildings be identified.

Response HR-20 – The Final Plan includes a map (Figure 1.1) that illustrates historic buildings and designed landscape areas. In addition, Appendix C of the Final EIS lists the contributing buildings of the NHLD. A complete listing of all features, contributing and non-contributing, may be found in the 1993 National Historic Landmark Update form, located in the Presidio Trust Library.

HR-21. ***Historic Gun Batteries***

Two commentors ask the Trust to address potential impacts on the Presidio's historic gun batteries. The Council on America's Military Past states that the Plan does not deal with these features of the Presidio and that they are not all labeled in the Plan. They are concerned about the Trust's recent management of Battery Stotsenberg-McKinnon, which led to damage to the battery's historic earthworks and historic fabric. They recommend that the Trust turn over responsibility for management and preservation of the batteries, along with monies necessary for their preservation, to the NPS, because the Trust "thoroughly demonstrated that it is not competent to manage such historic structures."

Response HR-21 – The Trust acknowledges that damage was incurred at this battery, as documented by the Trust's Historic Preservation Officer and Museum Specialist. Since the time of the comment letter, the Trust has made repairs to the damaged fabric, instituted hands-on preservation training for

Operations staff working around the Presidio's batteries, set up a monitoring program for Battery Stotsenberg-McKinnon and associated artifacts, and is developing an action plan for the Battery's preservation consistent with the NPS Manual referenced in the comment letter. The Presidio Trust recognizes that the Presidio's coastal/harbor defense structures are contributing structures to the Presidio's NHLD and that they display the evolution of harbor and coastal defense technology from the Civil War to World War II. As such, they will be preserved and protected and utilized in interpretive programs to help tell the story of coastal defense in the Bay Area. In addition, some of the structures may be reused for storage to support park operations, as was done under the military, or rehabilitated for new uses in the future, consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The Trust will utilize the NPS Manual for the Preservation of Coastal Batteries in the management of these structures. A statement has been added to the Final EIS to this effect. At this point in time, the Trust is not considering turning over responsibility of the historic defense batteries located in Area B to the NPS. However, the Trust will coordinate with the NPS on interpretation opportunities for these structures.

ASSESSMENT OF EFFECTS

HR-22. ***Level of Information and Analysis***

Several commentors, including environmental and preservation organizations and the NPS, suggest that the discussion of impacts and alternatives in the Draft EIS related to Area B's historic resources is problematic. They describe the discussion of impacts and alternatives in the Draft EIS as inadequate because the recommendations are too general and yet, when implemented, could have significant impacts. They assert that in order to adequately assess the level of impacts on the NHLD, the EIS should provide information about densities of each planning district for each alternative, building-specific size and use, and structures proposed for removal, rehabilitation, and/or new construction. The NPS states its concern that the PTIP "has not identified the cultural resources to be removed or affected and the impact of the Plan on the National Historic Landmark District (NHLD) cannot be adequately evaluated. The cumulative effect of boundary erosion or the continued removal of contributing structures could each constitute an unmitigatible adverse effect on the NHLD." They request that analysis of specific plans, significant adverse impacts, and specific mitigations for these impacts be provided. They also request that the Trust substantiate the EIS conclusion regarding the NHL integrity under all of the alternatives; since the alternatives do not identify structures to be removed nor the location and details of new construction, it is impossible to evaluate the effects of each alternative.

Response HR-22 – The EIS has been modified in part to address these concerns. The Final EIS and PTMP are programmatic level documents and therefore do not include building-and site-specific treatments. However, the PTMP states a clear commitment by the Trust to protect and preserve the overall integrity and status of the NHLD. In addition, the Final PA acknowledges that PTMP is a programmatic document and sets forth a process for review and consultation of future proposed actions that could affect contributing resources of the NHLD, to ensure the Trust's compliance with the NHPA. The PA states: "Intended as a policy framework to guide the Trust's future activities, the [Plan] does not specify treatments for individual buildings or identify specific areas for new construction. Instead, the [Plan] envisions further project-specific and/or district-level planning prior to building demolition or new construction with the potential to adversely affect historic properties." It is through the course of project-specific planning that additional details such as building demolition, new construction, and design guidelines would be identified and assessed with opportunities for public input and agency consultation. See Figure 4.3 in the Final Plan with regard to Public Involvement in Implementation Decisions. The level of analysis requested by the commentors would be provided through the course of future planning and design work with implementation.

In response to the request to provide additional information for assessing potential effects, the Plan has been modified to include, in Chapter Three for each planning district, the existing total building area, maximum permitted building area, maximum demolition, and maximum new construction in addition to land use preferences. The Plan also includes a set of planning guidelines for each district that would form the basis for future implementation activities. The assessment of cultural resources impacts in the Final EIS has been expanded to include a summary of related actions in each planning district for each alternative.

The EIS concludes that, with the exception of the Resource Consolidation Alternative (which would demolish the historic PHSH complex; see Response HR-26) and the Minimum Management Alternative (which would not demolish buildings), building demolition under the alternatives may result in significant adverse effects on individual resources that contribute to the NHLD; however, the overall status of the NHLD would be protected. The consultation process set forth in the PA, as well as the Trust's commitment to ongoing public review and input on projects, will ensure this protection.

HR-23. ***Preservation Plan***

The California Preservation Foundation suggests that the Trust develop a preservation plan for Area B, with historic significance the overriding guide when demolition is considered. The preservation plan should also include guidelines for new construction to comply with the SOI standards, and be subject to NEPA review with alternatives and mitigations included.

Response HR-23 – The PTMP, a comprehensive programmatic-level plan that will guide the Trust's management of Area B, states the overarching goals and principles for how the Trust will take care of and protect the NHLD. The Presidio Trust recognizes the value and significance of the Presidio as an NHL, and the Trust's important role as steward of this landmark. The Plan's language has been strengthened to make this point very clear. Given the complexities the Trust faces in managing the Presidio in accordance with the Presidio Trust Act, and the need for some flexibility in implementing the PTMP over the next several years, the Trust cannot, at this point in time, provide building-specific treatments for all contributing buildings, nor does it anticipate the need for a preservation plan along the lines suggested. However, PTMP sets forth several key elements that would typically be found within a preservation plan and that will in effect form the basis for the Trust's preservation management program.

- A clear statement about the Trust's commitment to the protection and preservation of the overall integrity and status of the NHLD;
- Planning principles (see Chapter One) that provide for the protection of the NHL, and the possibility of demolition and new construction in a manner that is in keeping with the character and integrity of the NHLD;
- For seven planning districts, planning concepts and planning guidelines, consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, that will direct future changes within each of the districts;
- Identification of the planning and review processes for future decision-making, in particular for actions that could adversely affect historic properties, and subsequent levels of public involvement; and
- Recognition of the Final PA to fulfill the Trust's responsibilities under Section 106 and Section 110 (f) of the NHPA. See Appendix D of the Final EIS.

With regard to the level of detail the commentor requested be included in a preservation plan (additional new construction guidelines, alternatives and mitigations), the Trust anticipates that this information would be forthcoming as part of future site-specific implementation activities. At that point in time, any design guidelines, alternatives, and environmental analysis deemed necessary would be conducted. Please refer to Chapter Four of the Final Plan for more information about implementation. In addition, the PA stipulates that the Trust shall prepare, each year, a report describing how the Trust is carrying out its responsibilities under the PA. The Trust will make this annual report to the public and interested persons, who may provide comment to the ACHP, SHPO, and Trust.

In conclusion, the Trust is not required to prepare a comprehensive preservation plan per se for the management of Area B historic resources. However, the Trust believes that PTMP forms the framework for the Trust's management of these resources and, when complemented by future plans and activities, will constitute the essence of a preservation plan to ensure the long-term protection and preservation of the NHLD.

HR-24. ***Comprehensive Assessment of Effects***

The NPS requests that the Trust demonstrate its commitment to the preservation of the NHLD through a comprehensive assessment of potential effects that will identify an alternative/development scenario that supports its commitment. The Trust should conclude that the PTIP would have the

potential for an adverse effect to individual historic structures, the NHLD status, and the cultural landscape. ("It is our professional opinion that the consolidation of new construction in the historic areas of the Letterman hospital, the Main Post and Crissy Field and the demolition of the PHSH would have an adverse effect on the NHLD.")

Response HR-24 – The Final Plan has been modified to state clearly that the Trust is committed to the protection and preservation of the overall integrity and status of the NHLD. The Trust concurs with the commentor that future action could have adverse effects on individual historic structures and the cultural landscape. However, the Trust concludes that, through conformance with the planning guidelines as well as the planning principles and other stipulations (as outlined in the PA), including subsequent analysis, review, and public input, these actions (individually and collectively) will not impair the integrity of the NHLD.

The Final EIS has been modified to make the assessment of potential impacts on the NHLD and on individual resources clearer. In the Final Plan Alternative, the amount of allowable new construction in the Crissy Field district has been reduced compared to the Draft Plan Alternative, and all new construction would be subject to constraints designed to avoid affecting the NHLD. Demolition of the PHSH complex is contemplated only under the Resource Consolidation Alternative. In the Final Plan Alternative, only the non-historic wings are proposed for demolition (consistent with the 1994 GMPA proposed action). Lastly, the Final PA outlines criteria and processes for the Trust to use in determining effect and pursuing consultation with the ACHP, SHPO, NPS, and other parties, if necessary, for actions that would have a significant adverse effect on cultural resources, individually and cumulatively.

HR-25. ***Cumulative Effects***

The NPS comments that the assessment of cumulative effects on the NHLD must consider the potential loss of the Presidio's NHLD status in a state and national context.

Response HR-25 – While individual historic resources may be adversely affected over time (and these would be subject to additional analysis and consultation with the NPS and others), the overall integrity and status of the NHLD will be preserved and protected by adoption of the Final Plan or any other EIS alternatives except the Resource Consolidation Alternative. See Response HR-26. Therefore, the Trust does not agree that a consideration of the potential loss of the NHLD status in a state and national context is warranted. Also see Response HR-24.

HR-26. ***Effects of Removal of the PHSH***

The NPS asserts the EIS improperly states that removal of the PHSH would not affect the integrity of the NHLD, and that this action should be identified as an adverse effect not capable of mitigation.

Response HR-26 – In response to comments, the EIS has been modified to clarify that removal of the PHSH and historic outbuildings that make up the entire complex, as documented in the Resource Consolidation Alternative, would have an adverse effect on those particular historic resources and on the status of the NHLD.

HR-27. ***Effects of Retaining Buildings 40 and 41***

One individual requests that the EIS identify the impacts, which he believes to be significant impacts, on El Presidio from retention of Buildings 40 and 41, both contributing structures to the NHLD. He recommends that the Plan be revised to encourage the archeological excavation, display, and interpretation of El Presidio, which should take precedence over the retention of the World War II barracks on the Main Post.

Response HR-27 – The Final Plan and EIS are programmatic-level documents and do not provide building-specific treatments. Buildings 40 and 41 are contributing structures to the NHLD, and have acquired significance as representative buildings from the World War II era, only a handful of which remain on the Presidio. Specific treatments for these buildings, in relationship to preservation planning for El Presidio, would be addressed in a future, site-specific planning process. Nonetheless, the Final Plan does contain policies in support of archeological resource identification and interpretation Presidio-wide, and particularly at El Presidio. The Trust will prepare an Archeological

Management Plan for the El Presidio to inform site-specific planning and alternative treatments for both the site and the surrounding buildings.

HR-28. ***Inconsistency with NPS Management Policies***

The NPS requests that the Trust conform to the NPS Management Policies on cultural resource management. Further, the NPS claims that PTIP is inconsistent with NPS Management Policies concerning the adaptation and use of historic structures. The NPS states that federal agencies are required to make every reasonable effort to use existing contributing structures rather than propose new construction. The NPS points out that NPS Management Policies state that if new construction is to be considered, it cannot be an intrusion to significant cultural or natural resources. The NPS suggests that the Plan does not provide enough information on new construction to determine if it will affect either natural or cultural resources.

Response HR-28 – The Trust is not subject to NPS Management Policies. However, the Plan has been modified, and sections clarified, to address these resource management concerns raised by the NPS. As stated in the Response HR-5, the Plan has been strengthened to articulate the Trust's commitment to the preservation of the Presidio's NHLD status. The Final Plan also states that the Trust will undertake as little new construction and as little demolition of historic buildings as possible, and will engage the public, as well as historic preservation agencies, for input in the decision-making process.

CONSULTATION

HR-29. ***Consultation with Ohlone***

Several organizations, including the NPS, encourage the Trust to engage in consultation with the Ohlone people as part of the PTMP planning process. One commentor asks why the Trust has not signed a Memorandum of Understanding with the Muwekma Ohlone.

Response HR-29 – The Trust included the local Ohlone and other Native American groups in the scoping of the Draft EIS. As part of scoping, the Conceptual Alternatives Workbook, used to seek input on environmental issues that should be considered and topics that would form the foundation of the Draft Plan and alternatives, was provided to these groups. Of the nine groups that received this material and who were invited to provide comment, none responded. The list of Ohlone groups who were contacted was originally provided to the Trust by the NPS. Furthermore, the Final PA acknowledges that "the Trust has made a good faith effort to locate federally recognized Indian tribes that may attach religious and cultural significance to properties under the administrative jurisdiction of the Trust or with which the Trust could consult under the Native American Graves Protection and Repatriation Act; and the Trust has determined that there are no such federally recognized tribes." While no memorandum of understanding is legally required, and no representatives of Ohlone or other Native American groups responded to project scoping, the Trust is committed to continued consideration of issues of importance to these groups, and welcomes their ongoing input.

4.10 ARCHEOLOGICAL RESOURCES (AR)

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AR-1. ***Underground Parking***

The NPS requests that the EIS should address the archaeological impacts of subsurface parking facilities.

Response AR-1 – The Final Plan and EIS have been modified in response to this comment. Underground parking is not currently being proposed as part of this planning effort, but may be considered at a later date subject to separate environmental and public review. Underground parking would most likely destroy any archaeological deposits within its footprint. The areal extent of site destruction would be commensurate with the size of the parking facility and its coincidence, if any, with archaeological deposits. The significance of the archaeological impacts would be directly related to the significance of the resource being affected, which is unknown at this time but would be examined during future studies. The construction of underground parking within the quadrangle of the archaeological site of El Presidio de San Francisco and its exterior catchment areas would not be considered during any future planning efforts, as the Trust is committed to preserving this significant archaeological resource. Some archaeological resources could be covered to a sufficient depth by historic and modern fill deposits to avoid impacts from underground parking, but at this time data are insufficient to make this determination.

AR-2. ***Impacts of Dune Mobility***

The USFWS requests an explanation as to how adverse impacts to archaeological sites would result from shifting dunes.

Response AR-2 – New impacts to archaeological sites from shifting dunes would not occur because no shifting dunes are proposed. For existing dune formations, in addition to site exposure by dune transgression and preservation by dune burial, archaeological sites lose stratigraphic context and may become deflated when materials are moved. Temporarily exposed artifacts may be subject to illegal collection by the public. According to Leo Barker, GGNRA Archaeologist, impacts to archaeological sites, including the exposure of human burials, is a significant ongoing management concern of the NPS at Point Reyes, the Marin Headlands, Fort Mason, as well as at the Presidio.

AR-3. ***Building Demolition***

The USFWS seeks an explanation as to why demolition of buildings within original footprints would be less of an impact to archaeological resources than stump removal and surface soil scraping.

Response AR-3 – The analysis of impacts to archaeological resources is conducted on a case-by-case basis. In many cases, a careful review of as-built drawings, photographs and other construction documents demonstrate significant levels of heavy equipment grading, paving or other alteration to the historical landscape which would preclude the survival of archaeological deposits at or near the ground surface. Those archaeological resources below the impact zone from the building's original construction are often likely to not be affected by its deconstruction unless over-excavation is required for some reason such as environmental remediation. Many of the buildings at the Presidio are "temporary" structures erected in World War I or II and rest on concrete piers. Demolition of these, like their construction, may have minimal or no impact on archaeological resources. Impacts to archaeological resources from stump removal and soil scraping are more likely to occur in some areas for the reasons listed below. Areas of open space and vegetation in many instances are removed from the intense construction and operations activities found in the more developed portions of the Presidio where most of the building construction occurred. Trees planted by the Army as seedlings made minor intrusions into archaeological deposits at the time of planting, but have expanded in breadth and depth during their period of growth. Stump removal by grinding causes minimal to no impact to archaeological resources while stump removal by excavation can cause impacts by both over-excavation, which is required to remove the stump, and movement of equipment, if not

restricted to existing roadways. Surface soil scraping destroys any archaeological deposits or artifacts on the surface of the ground. Archaeological resources known as "sheet scatters" are dispersed surface remains of short-term and single use during both prehistoric and historic times. Intact sheet scatters of historic materials may occur around the areas used historically by the Army or by earlier native populations. These are less likely to exist in the developed areas of the Presidio and more likely to be intact in the areas of open space and forestation.

AR-4. ***Tennessee Hollow Restoration***

The Urban Watershed Project asks the Trust to commit to archaeological and cultural resource investigations in advance of restoration work for Tennessee Hollow.

Response AR-4 – The Trust will comply with the NEPA and the NHPA, as well as the planning guidelines, as it prepares a restoration plan for Tennessee Hollow and will include public involvement during the various phases of planning and technical studies. The Tennessee Hollow restoration planning effort will analyze impacts on cultural and archeological resources and on the National Historic Landmark District and seek to avoid or mitigate such impacts. It will conduct appropriate archaeological and cultural resources investigations and monitoring in advance of and during the implementation of the Tennessee Hollow project. See Response PG-31.

AR-5. ***NPS Specific Comment***

The NPS notes that the EIS states that impacts could range from minimal to significant for archaeological sites and requests that the Draft Plan be developed to the point where effects can be meaningfully evaluated.

Response AR-5 – As noted in the EIS, based on prior archaeological discoveries at the Presidio, it is likely that additional significant subsurface prehistoric archaeological sites are present within the Presidio. Sensitivities are then noted within each planning district; however, it is concluded that direct impacts on all archaeological sites cannot be analyzed at the present time because all sites for new construction and associated actions have not been identified. The Programmatic Agreement includes mitigation that would avoid or mitigate any potential adverse effect and would apply to all alternatives. While the EIS does not indicate which specific archaeological resources would be affected by any alternative, it provides a meaningful evaluation of how disturbance to resources could occur and how the Programmatic Agreement would provide a means for protecting such resources, if encountered.

4.11 PROGRAMMATIC AGREEMENT (PA)

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PA-1. *Revise PA to Provide More Public Participation*

PA-2. *Modify PA to Incorporate 106 Review Procedures*

PA-3. *Amend PA to Apply the Same Evaluation Process for Archaeological Properties .*

PA-1. *Revise PA to Provide More Public Participation*

Various historic preservation organizations and one individual specifically characterize their primary concerns regarding the Draft PA as the need for "a meaningful and timely voice in the ongoing Section 106 reviews during the development of the Presidio," and the "lack of any meaningful role for consulting parties…as well as the extremely limited provision for public involvement." Commentors also state that the Draft PA gives too much discretion to the Trust regarding land use and mitigation decisions integral to the planning process, and moreover, that these decisions should not be made unilaterally. The commentors request that the Draft PA be revised to include a much stronger role for the consulting parties and the public in making these decisions.

Response PA-1 – The Presidio Trust has carefully reviewed and considered every comment provided in writing and during the consultation sessions and has responded to them through substantive changes or formal alterations to the PA as appropriate. Consulting agencies, including the Advisory Council on Historic Preservation, the California State Historic Preservation Officer (SHPO), and the NPS, have reviewed these changes and signed the final agreement. A signed copy of the PA is provided in Appendix D of the Final EIS.

Examples of the changes made in response to public input are provided in the following sections of the PA:

- Stipulation VI (formerly Stipulation VII): the concern that the Trust might be "delisting" properties from the National Register is addressed;
- Stipulation VII (formerly Stipulation VIII): significant format changes have been made in order to clarify how the Stipulation functions; and
- Stipulation IX (formerly Stipulation X): particular roles for concurring parties have been added in the development of future planning documents, the consideration of certain proposed demolition, and the review of certain proposed new construction that may have an adverse effect on historic properties.

During the consultations on the PA, the Trust emphasized to the consulting parties that meaningful consideration of cultural resource values in future projects is most likely to happen if the public and organizations interested in historic preservation participate and provide input to the Trust at the earliest stages of planning. To this end, the Presidio Trust has and will continue to follow 36 CFR 800.8. This provision encourages federal agencies to "consider their Section 106 responsibilities as early as possible in the NEPA process and plan their public participation, analysis and review in such a way that they can meet the purposes of both statutes [NHPA and NEPA] in a timely and efficient manner." The Trust therefore urges interested preservation organizations to avail themselves of the substantial opportunities to advance the cause of historic preservation offered by this approach.

In addition, the Trust agreed to provide the following notification to the parties concurring in the Final PA (the National Trust for Historic Preservation and Fort Point and Presidio Historical Association):

- Scoping notices for Trust projects that would be subject to Environmental Assessments or Environmental Impact Statements;
- Project documents related to the above notices will be made available for review in the Presidio Trust library;
- Agendas (via email) of regularly scheduled NEPA/NHPA (known as "N^2") review meetings that describe Trust projects that are being considered for a Categorical Exclusion under NEPA; and
- Summary results (via email) of the N^2 meetings.

The Trust believes that use of the NEPA public participation process provides an opportunity for early and meaningful discourse on historic preservation

issues by the consulting parties and the public while still achieving the purpose of 36 CFR 800.14 in streamlining compliance activities at the Presidio through the use of a Programmatic Agreement.

PA-2. ***Modify PA to Incorporate 106 Review Procedures***

Various historic preservation organizations recommend that the 106 process needs to be incorporated into the PA, because they believe that the NEPA process provides less strict scrutiny of potential adverse effects on archeological resources, historic buildings, or on the streetscapes and other features that contribute to the unique character of the Presidio. They urge the Trust to incorporate guidelines from the NHPA in the PA to ensure the preservation of the NHLD.

Response PA-2 – It appears that the commentors' concern arises from the inherent difference between a Programmatic Agreement under 36 CFR Part 800 Subpart C and Section 106 compliance achieved through 36 CFR Part 800 Subpart B. It has been stated "the review processes described in the Programmatic Agreement for projects in historically or archaeologically sensitive areas (particularly the Main Post, Fort Scott and Crissy Field districts) should be modified to incorporate the procedures set forth in the federal regulations governing the Section 106 consultation process under the National Historic Preservation Act." However, as the Advisory Council on Historic Preservation made clear in their response to comments on the previous proposed revision to 36 CFR 814, "[t]his section…provides for new options for agencies to pursue in streamlining their section 106 compliance activities and incorporates the practice…of developing Programmatic Agreements to facilitate coordination between Section 106 and an agency's particular program." The Trust believes that the Programmatic Agreement document is consistent with the Part 800 regulations, although as a Programmatic Agreement it inherently takes a different and streamlined approach to achieve 106 compliance than the one included in Subpart B. The processes proposed for this PA (particularly when viewed in light of the interaction with the Trust's NEPA procedures) are legitimate alternatives to the Subpart B procedures and embody adequate opportunities for the involvement of the public and consulting parties in keeping with the sense of Part 800.

PA-3. ***Amend PA to Apply the Same Evaluation Process for Archaeological Properties .***

The CCSF Planning Department contends that if the Trust determines an archaeological property to be eligible for listing on the National Register, the Trust should treat it as eligible for 106 purposes. They believe that if the Trust determines that an archeological property is ineligible, and the Trust and NPS agree, then it is ineligible. They also believe that if the Trust and NPS disagree about a property the Trust has determined as ineligible, then the Trust should request an opinion from the SHPO.

Response PA-3 – Programmatic Agreement Stipulation XIII B requires that archaeological discoveries be handled in accordance with a site-specific research design or archaeological management plan, and allows the Trust to assume the property is eligible for the National Register and act accordingly. Stipulation VI C concerns the situation in which the Trust believes a discovery is ineligible, and provides for consultation with the NPS and the SHPO as suggested by the commentor.

4.12 OPEN SPACE (OS)

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OS-1. *Open Space Vision*

OS-2. *Landscaped vs. Natural Open Space*

OS-3. *Contiguous Open Space vs. Housing vs. Historic Resources*

OS-4. *Open Space Priorities*

OS-5. *Transfer of Open Space Areas to NPS*

OS-1. *Open Space Vision*

The GGNRA Citizens' Advisory Commission and various natural resource conservation organizations and individuals request that the Plan include a broader natural open space vision that unifies the park's fragmented natural areas into contiguous natural corridors with high biological value. They note that such a vision would increase biologically important open space; minimize habitat fragmentation; restrict traffic impacts, lighting and domestic pets to areas already developed; improve the setting for passive recreation; and improve travel times of the internal shuttle. Some believe a cohesive vision would return the Presidio to its historic, pre-1945 land-use pattern of compact communities. The California Native Plant Society points out that if portions of the ridgeline now containing existing serpentine grassland habitat, which are currently isolated from each other by buildings, planted trees, and landscape vegetation, were restored to a mosaic of native grassland patches and native scrub and forest, this would substantially increase the potential for long-term survival and persistence of native plant species, increase habitat quality for a diversity of wildlife, and create an enhanced park visitor experience and education. Other commentors note that unless the habitat loss and fragmentation can be reversed, it is likely that many more species will become extinct on the Presidio over the next several decades.

Not all commentors support this open space vision. One individual implies that open space should not be increased because it is not a revenue-generating use. Others see an increase in open space as a threat to the integrity of the cultural landscape. Other commentors believe that there is adequate open space in San Francisco and that the cultural and housing potential of the Presidio, with its rich and interesting building stock, should not be overlooked in an "ill-considered quest for more open space."

Response OS-1 – The Final Plan will increase the Presidio's open space by 99 acres, emphasizing the protection of both the natural and cultural resources at the Presidio, and prompting the long-term ecological health of the remnant native vegetation communities. The PTMP adopts the management objectives stated in the VMP, by creating viable ecological corridors throughout the southwestern dune system, the coastal bluff tops and the Tennessee Hollow watershed. Establishment of these larger contiguous corridors (with fewer edges) allows more sustainable management, promotes increased species richness, reduces urban pressures, and better protects wildlife movement by linking existing remnant natural areas, creating open space buffers and establishing connections to important habitats. Creation of these native corridors will be realized through the support of community stewardship, and will result in increased opportunities for diverse passive recreational experiences. Open space restoration priorities are based on the objectives for natural habitat protection in the PTMP, and focus on the linkage and restoration of existing remnant systems. Large-scale efforts that could benefit open space improvements are being coordinated so as to be consistent with the Trust's environmental remediation program, USFWS recovery plans, and implementation of the VMP.

As discussed in the PTMP, scientific data collection and monitoring will help guide future long-term planning restoration priorities for the Presidio's rare serpentine communities and associated special-status species recovery. The Trust will conduct additional soils surveys and habitat analysis where necessary to determine the restoration potential of targeted serpentine vegetation communities within East Washington housing and the non-turf areas of the golf course. The Trust is currently expanding serpentine grassland restoration efforts within the Inspiration Point region, and east of the World War II Memorial. Included in these efforts is the reintroduction of extirpated species where appropriate – re-establishing some of the important species that have been lost throughout the past 200 years. Additionally, the

proposed Golf Course Habitat and Wildlife Management Plan will identify management actions to promote linkages between ecological systems and maximize natural resource values. The Trust also recognizes the importance of protecting and enhancing small, isolated native vestiges scattered throughout the Presidio that could serve as significant habitat for key pollinators, promote supporting important linkages for gene flow, and connect important ecological islands within larger corridors. The PTMP will promote further protection of these remnant patches by managing them, to the greatest extent feasible, consistent with the VMP native plant community zone objectives. The increase in the Presidio's open space will not occur without regard to financial considerations or the Presidio's housing potential. The Final Plan projects that the increase in open space that will result from the removal of non-historic housing, including Wherry Housing and some of the West and East Washington Boulevard housing in its South Hills district, will occur over a thirty-year period. This projected time frame will allow the Trust to take advantage of the revenue-generating capacity of these buildings. The Plan further projects that housing units lost through demolition of these buildings will be recouped through subdividing other Presidio dwelling units, converting non-residential buildings to residential use, and building some replacement construction in already developed areas of the Presidio. Refer to Final Plan, Chapter Two, Housing, and also see Response OS-3.

OS-2. ***Landscaped vs. Natural Open Space***

An individual requests that the PTIP show on a map the proposed open space gains by VMP zoning category (i.e., native plant communities, historic forest, and landscaped areas) to provide a clearer picture. Another individual suggests that the PTIP distinguish between natural open space and landscape open space and finds the definition of open space and the summary table in the document confusing and in need of refinement.

Response OS-2 – The Final EIS includes land use maps for each alternative that distinguish between the various types of open space, consistent with the VMP zoning designations. Management of these open space types (native plant communities, historic forest, and cultural landscapes) would be consistent with management objectives stated in the VMP. For example, open space designated as native plant communities would be managed to promote and restore ecological values. Table 1 in the Final EIS provides a detailed breakdown of the changes in open space, and can be referenced when reviewing the Final Plan's open space summary table.

OS-3. ***Contiguous Open Space vs. Housing vs. Historic Resources***

The San Francisco Planning and Urban Research Association (SPUR) favors maximizing contiguous open space but only to the extent that other uses are not transferred to already disturbed land that should be used for replacement housing. SPUR maintains that more contiguous open space can and should be created in part by concentrating housing around transit and other amenities, and suggests more planning in the infill areas to determine the trade-offs between the loss of housing and the addition of open space. Other commentors question creating more open space in the southern part of the park and replacing it by increasing the density in the northern parts of the park, and ask whether this would increase housing rents for the same amount of space.

Response OS-3 – Similar to the Draft Plan, the Final Plan calls for the removal of Wherry Housing, and some of the West and East Washington Boulevard housing in the South Hills district in order to restore contiguous open space and native plant habitat. In addition, the Final Plan states that at the remaining East and West Washington sites, the Trust will improve the landscape to complement the surrounding natural environs. This housing would be removed in phases. The Final Plan commits that the number of housing units and other residential accommodations will not exceed the current number (approximately 1,650). To accomplish this, the units removed in the South Hills district will have to be replaced; there are several options for doing this. However, the Plan also assumes that, though the number of dwelling units will not exceed the current amount, the total building square footage dedicated to residential uses will be reduced from what it is today (in effect suggesting that the same number of units will be within a smaller amount of built space).

The Trust concurs with SPUR's recommendation that more housing be located closer to transit service and other amenities. The Final Plan envisions that residential uses are the primary uses that will be transferred from open space restoration areas to already disturbed areas. In addition to the removal

of non-historic residential buildings, the Plan provides for changes in the composition of housing at the Presidio over time through subdividing existing non-historic dwelling units, as well as converting non-residential buildings to residential use in areas closer to transit and activity centers. Some new construction could replace existing non-historic buildings, improve the aesthetic and historic qualities of the park, and make more housing closer to public transit and other park amenities. Any new residential construction will involve additional planning, public input, and environmental analysis. See Chapter Two, Housing, of the Final Plan.

With regard to the concern about potential effects of new housing on rental rates. The Plan does not, and cannot, prescribe the precise number of units, precise rents or affordability criteria, or the precise mix of occupants. These results will be determined as buildings are rehabilitated, as housing demand and employment are monitored, and as evolving market conditions intersect with overall Plan objectives.

OS-4. ***Open Space Priorities***

Presidio Native Plant Nursery and restoration volunteers urge the Trust to give native habitats priority over ornamental landscaping that is labor intensive, more susceptible to disease and insect infestation, and generally higher maintenance.

Response OS-4 – The Trust recognizes and supports the imperative of restoring the Presidio's remnant native habitats, specifically those areas harboring rare species. The Trust also has a mandate to protect and rehabilitate the Presidio's cultural landscapes and historic forest which contribute to the NHLD. The PTMP is guided by the vegetation management framework set forth in the adopted VMP that seeks to balance these objectives. While the VMP does not establish priorities for management activities between vegetation zones, it promotes sustainability practices within designed landscapes with the goal of reducing irrigation, herbicide application, intensive maintenance, and increasing practices such as composting, integrated pest management and mulching.

OS-5. ***Transfer of Open Space Areas to NPS***

A few commentors ask the Trust to address Section 103(b)(1) of the Trust Act. They ask the Trust to consider the transfer of open space areas to the NPS, and to explain why open space is not proposed for transfer back to NPS jurisdiction and administration. One commentor suggests that the Trust is required to transfer open space areas to NPS.

Response OS-5 – Under Section 103(b)(1), the Trust is "encouraged to transfer to the administrative jurisdiction of the Secretary open spaces which have high public use potential and are contiguous to other lands administered by the Secretary." This provision is not mandatory but discretionary; it *encourages* but does not direct the Trust to act.

The Trust has not foreclosed the possibility of transferring open space areas of the Presidio within Area B to NPS, but is not currently proposing any such transfer. The Plan's silence on this issue does not, however, prevent the Trust and the NPS from considering and assessing the appropriate implementation of this provision in the future.

The Trust and the NPS regularly collaborate on the management of open space areas within Area B. A natural resources Memorandum of Agreement between the NPS and the Trust guides the implementation of key natural resource projects within Area B's open spaces. The two agencies are jointly managing other open space projects that cut across the jurisdictional boundaries of the two agencies, such as the Trails and Bikeways Plan. Other cooperative efforts include the Mountain Lake Enhancement Plan and the Crissy Marsh Study. This type of ongoing collaboration and joint implementation of projects related to the Presidio's open space limited any need for the Trust to propose transfer of open space acreage to the NPS in the Plan. For further response to this comment, refer to Response FI-24.

4.13 WATER RESOURCES (WR) AND BIOLOGICAL RESOURCES (BR)

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Water Resources

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WATER RESOURCES

WR-1. *Watershed Inventory and Management*

The San Francisco County Transportation Authority (SFCTA) requests that the EIS mention and accurately identify the many watersheds that drain to the Bay.

Response WR-1 – All watershed boundary and sub-watershed data currently used by the Presidio Trust are based on NPS data sets. NPS maps identify three primary watersheds and six sub-watersheds at the Presidio[1]. The Draft EIS included discussion about each of these watersheds (page 129). In response to these comments, the EIS was revised to more clearly discuss these watersheds and associated subwatersheds.

Watershed planning efforts within the Tennessee Hollow watershed are already underway in collaboration with the NPS. The environmental analysis for these planning efforts will address the effects of changes in the watershed due to planning efforts. Similar analyses will be applied to future planning efforts as warranted.

WR-2. *Groundwater Resources*

The SFCTA points out that the EIS should note that groundwater occurs in Bay Mud and artificial fill, and should include the type of groundwater monitoring that will be most useful in the effort to protect subsurface hydrologic resources and function. The CCSF Planning Department comments that there is no discussion of the potential impacts on groundwater resources, either in terms of current contamination or the effects of the various alternatives on groundwater quality or quantity, and questions whether development of groundwater wells in either the Lobos or Marina groundwater basins is being considered.

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[1] Mapping boundaries were developed such that several smaller drainages located in the western coastal serpentine bluffs were combined into single sub-watersheds (NPS, 2001).

Response WR-2 – As requested, the EIS was revised to include information on groundwater occurrences. The Trust, in coordination with the NPS, is performing park-wide groundwater monitoring to evaluate and document existing groundwater conditions. In areas where groundwater has been affected by the Army's operations or disposal practices, the Trust is working with regulatory agencies to clean up the groundwater to levels that are protective of human and ecological health, and to preserve the groundwater as a potential resource. Additionally, a surface and groundwater monitoring program is underway within the Tennessee Hollow watershed to provide data necessary to support restoration design alternatives. Fifteen wells are continuously monitored to gather data, including the depths of aquifers and changes in the elevation of groundwater in response to surface water recharge.

Groundwater monitoring protocols may be designed to evaluate subsurface hydrologic resources. If potentially damaging or intrusive activities are proposed during site-specific planning, monitoring protocols would be designed to specifically address monitoring objectives. Activities could include such actions as hydrologic parameter testing, pump testing, or potentiometric testing.

Groundwater contamination caused by the Army's operations and disposal practices has been identified in a few limited areas of the Presidio. These areas are monitored under the oversight of state regulatory agencies. The Trust is careful to minimize the chances that current operations will have any negative effects on groundwater. The Trust presently has no plans to install or use wells for water supply within the Lobos Creek watershed. Additional planning and environmental review will be undertaken if well installation activities within this watershed are considered.

WR-3. ***Underground Parking***

The NPS requests that the EIS assess the potential impact of an underground parking garage on groundwater flow.

Response WR-3 – No underground parking features outside of the 23-acre LDAC are proposed under the Final Plan. Any additional underground parking structures would be further evaluated under future site-specific planning with the appropriate level of environmental review.

WR-4. ***Stormwater***

Various commentors request that the Trust improve the EIS assessment of stormwater impacts on the Crissy Marsh, including quantifiable information about the quality and quantity of runoff associated with levels of development contemplated by the Draft Plan and other alternatives. While Mitigation Measure NR-15 calls for monitoring runoff into the Crissy Marsh, commentors request that the EIS indicate who will conduct the monitoring, for what constituents, at what frequency, and how data will be analyzed as well as used in guiding mitigation. Commentors request that the Trust also add a program of storm drain water quality monitoring and a program to eliminate pollutant sources that could affect the Crissy Marsh. The NPS expresses concern about the increase or decrease in stormwater runoff, volume, and quality, and adequate protection of Area A resources.

Response WR-4 – In response to these comments, the Water Resources and Storm Drainage sections of the EIS were revised to articulate more clearly the Trust's commitment and strategy to ensure stormwater discharge quality protection of the marsh and other bay resources. The Trust, in coordination with the NPS, is finalizing an interim Stormwater Pollution Prevention Plan (SWPPP) that will include the sampling design and protocol, threshold requirements for constituents monitored, and a reporting mechanism. This is an interim plan that adheres to the general guidelines for stormwater management as established under the National Pollutant Discharge Elimination System (NPDES) and will remain in effect until the Trust obtains a Phase II NPDES permit. Stormwater monitoring, which will be implemented at all outfalls, will become effective in 2002. Plan implementation activities will be conducted by either Trust or NPS staff, or by contractors. Additionally, the SWPPP will include Best Management Practices (BMPs), consistent with the California Stormwater Best Management Practices Handbook, that will form the basis for a Phase II NPDES permit with the Regional Water Quality Control Board (RWQCB). BMPs include the installation of oil/water separators on discharge lines where appropriate. Separators have been installed on four discharge lines, including the E, F, and G-H drain systems that empty into the Crissy Marsh.

Stormwater quality standards will be based on the criteria identified in the interim SWPPP, and linked to the requirements set forth in the NPDES permit, regardless which EIS alternative is adopted. Therefore, an analysis

outlining differences in potential effects to stormwater quality by alternative was not included in the EIS. The NPS is referred to the discussion on the increased demand for stormwater drainage in the Storm Drainage environmental consequences section of the Final EIS (Section 4.6.3) for an analysis of changes in anticipated stormwater flows projected for each alternative.

WR-5. ***Irrigation Runoff***

Several commentors seek a commitment from the Trust to prevent polluted stormwater and irrigation runoff from entering any receiving waters. The Alliance for a Clean Waterfront supports a major reduction in the amount of impervious surface throughout the Presidio, reduction in volumes of landscape watering, and promotion of integrated pest management programs.

Response WR-5 – The Trust is committed to preventing pollution from stormwater and irrigation runoff from discharging into any receiving water body. In response to public comment, additional information on current and future actions the Trust will take to reduce runoff, improve water quality, and monitor the effectiveness of these actions was incorporated into the Final EIS. Also refer to Response WR-4, above.

The Trust attempts to prevent the discharge of polluted stormwater by addressing the water source before the water enters the storm sewer system. As described in the mitigation measures listed under Section 4.6.1 (Water Supply), the Trust will implement a variety of BMPs to improve irrigation efficiency throughout Area B. Also refer to the discussion of water conservation practices in Response UT-3. Additionally, the Trust landscape maintenance crews use an Integrated Pest Management (IPM) strategy[2] that promotes the use of preventative and non-toxic pest control methods and restricts pesticide use. Throughout Area B, biologically-based pesticides such as citrus-based products are used as an alternative to synthetic pesticides, and compost is regularly applied as an alternative to synthetic fertilizers.

The Trust also enforces an IPM policy with park tenants, including the Presidio Golf Course. The Trust and Arnold Palmer Golf Management are developing a detailed IPM for the golf course that uses pesticide alternatives, such as "compost tea," rather than fungicides. Preliminary efforts have been successful. In 2000 and 2001, the Presidio Golf Course used 90 percent less fungicide than the average private San Francisco area golf course. In fact, in 2001, the Presidio Golf Course was recognized with the National Environmental Leadership in Golf Award by the Golf Course Superintendents Association of America.

With implementation of mitigation measures in the Final EIS, as part of future planning projects, the Trust would limit or eliminate impervious surfaces in order to reduce stormwater runoff volumes and would seek stormwater reductions runoff reductions by using on-site vegetation and landscaping as a filtration and retention system to the extent feasible. See Mitigation Measure UT-7.

WR-6. ***Recycled Water***

Several commentors request that the EIS address the project-specific impacts of the proposed water recycling system. They urge the Trust to exert caution in applying recycled water to sensitive areas where it could alter the natural groundwater chemistry, flow characteristics, or nutrient content of native soils. They state that runoff of recycled water from ballfield irrigation, for example, should not be allowed to enter Tennessee Hollow.

Response WR-6 – The project-specific impacts of the proposed water recycling system, including effects on groundwater resources and adjacent uses, are evaluated in the Presidio Water Recycling Project Environmental Assessment (EA), which was released for public review and comment in March 2002. As described in the EA, all use of recycled water would be restricted to landscaped areas. Use of recycled water to irrigate ballfields within the Tennessee Hollow watershed is not proposed as part of the project. As part of the California state permit to operate a recycled water system for irrigation, runoff from areas irrigated with recycled water is prohibited. Stringent watering practices will help keep infiltrated water within the vadose zone and minimize water reaching the groundwater table. For additional

[2] The Trust's IPM strategy is guided by the IPM Action Plans for Pests at the Presidio of San Francisco, National Park Service (1996).

discussion of the proposed water recycling system, refer to Responses UT-1, UT-4, and UT-5.

WR-7. ***Wetlands Protection***

A number of commentors request that the Final Plan and EIS more fully address and evaluate the ecological significance of the wetland feature directly north of the Public Health Service Hospital. The U.S. Fish and Wildlife Service recommends that the Final Plan emphasize protection of the upper plateau and enhancement of soil and groundwater resources that support existing seasonal wetlands, and that the ecological significance of these wetlands be discussed in the EIS. They also recommend that any adverse impacts involving modification (by fill or drainage) of unique wetlands of the upper plateau should also be assessed. An individual urges that the remnant freshwater wetland located at the base of the western Crissy Field bluffs be expanded and restored.

Response WR-7 – In response to public comment, the Final Plan has been revised to indicate that the use of parking lot feature north of the Public Health Services Hospital would be for native plant communities consistent with the Vegetation Management Plan zoning. The EIS text has been revised to reflect this change. The analysis of impacts that could result from institutional/residential uses at the Nike Missile site north of the wetland is included in the Final EIS, and more detailed analysis will be provided during future site-specific planning efforts. Future-site specific planning will also evaluate the extent to which existing wetland features could be expanded.

WR-8. ***Wetlands Mapping and Policy***

The NPS requests that the EIS include an updated wetlands, streams, and drainages map, and that the Trust adopt a policy of no loss of existing wetland features.

Response WR-8 – As requested, the Plan and EIS have been revised to incorporate the most recent wetland data set, consistent with the draft 2002 Presidio of San Francisco Wetland Resources Inventory. As discussed in the Final Plan, future planning efforts will pursue no net loss of existing wetland features and will incorporate watershed management principles, which include treating watersheds as complete hydrologic systems and protecting stream processes that create habitat. Additionally, the Trust is committed to developing further details, guidelines, and policy as it undertakes site-specific planning. These will include more specific information regarding such parameters as compensatory mitigation and monitoring standards.

WR-9. ***Mitigation Measures***

The SFCTA notes that Mitigation Measure NR-13 (Wetlands Compliance) requires compliance with existing regulations and programs, and no additional mitigation for impacts is specified.

Response WR-9 – The Trust agrees that compliance with existing regulations may not be the most appropriate form of mitigation. However, the mitigation measure being questioned (the Clean Water Act Section 404 program) includes prescriptive actions that will reduce or eliminate impacts on wetlands that fall within the definitions of mitigation (avoiding, minimizing, rectifying, reducing, compensating) in the NEPA regulations. Since these actions will be effective in addressing an identified environmental problem, the Trust chose to list them as mitigation. Also refer to Response EP-30.

WR-10. ***Geological Resources***

The SFCTA asks if there are any other "unique geologic features" besides those identified in the Draft Plan (i.e., the Colma dunes and the bluffs south of Crissy Field and at Inspiration Point) and states that the current system may not provide for consistent protection of unique geologic resources. The agency requests that the EIS develop criteria for designating a geologic feature as "unique" and present a complete inventory of such features.

Response – The Final Plan briefly identifies some of the sensitive geologic resources found on the Presidio. These resources have been identified as "sensitive" by the NPS and Trust as they are either limited in range and size, support either rare or endangered vegetation communities, or are located along faults. (Refer to Item 17 in Appendix A of the Final EIS for a more detailed summary of the Presidio's geology and soils.) A more detailed discussion and analysis of these resources was omitted from the EIS as it is not anticipated that there will be any measurable effects at the programmatic level of the PTMP. Future site-specific planning will include additional review to evaluate geologic and seismic hazards, impacts on sensitive

geologic resources, and compliance with the Seismic Hazard Mapping Act. The condition of these geologic resources will be evaluated on a case-by-case basis during future site-specific planning, depending upon the extent of the planning effort and its location. Additionally, the GGNRA Natural Resources Management Plan (2001) identifies sensitive geologic resources within the Presidio. NPS staff are currently seeking funding to conduct further inventories of the Presidio's geologic resources.

BIOLOGICAL RESOURCES

BR-1. ***Natural Resources Protection***

Several commentors, including the NPS, natural resource conservation and neighborhood organizations, and individuals state that the Trust should not jeopardize the GMPA's and the Trust Act's goal of preserving and protecting the park's natural resources. Commentors request that the Trust "expand the natural beauty of the Presidio where possible," "preserve and enhance key natural resources and open space," and "include additional measures to create contiguous, biologically healthy open space."

Response BR-1 – A key principle of the Final Plan is to protect the natural resources at the Presidio and ensure their long-term health. The Trust will continue to work with the NPS to create self-sustaining ecosystems, where feasible, through restoration and management programs that include long-term community participation. To ensure integrated management across Areas A and B of the Presidio, a memorandum of agreement is being developed among the Presidio Trust, the NPS, and the Golden Gate National Parks Association (GGNPA) that will provide a framework for a collaborative natural resources program. The Trust will collaborate with the NPS to protect and enhance existing native plant communities and their remaining habitat and will increase areas of native plant habitat by up to about 130 acres. Natural habitats in the Wherry Housing area, Tennessee Hollow watershed, and Inspiration Point will be restored. Trust actions will be consistent with the objectives and zoning for native plant communities set forth in the Vegetation Management Plan (VMP), which identifies corridors and sites within the native plant communities zone proposed for restoration. Many of these areas are adjacent to existing native plant communities, where increased habitat will enhance rare or endangered plants and associated wildlife. The Trust will protect federal- and state-listed threatened and endangered species found at the Presidio. Appropriate actions will be taken to recover the species, and where possible to enhance and restore their habitats. Finally, native wildlife species and their habitats will be identified, protected, monitored and, where possible, restored. Wildlife corridors and habitat for nesting and migratory birds will be identified and enhanced. Wildlife surveys will be conducted. Activities that might disrupt sensitive wildlife habitat areas or corridors will be scheduled to reduce or avoid disturbance. Additional inventories will be conducted to identify terrestrial invertebrate and vertebrate species. Together, these actions will identify protect, enhance, restore, and expand the Presidio's ecosystems.

BR-2. ***Timing of Restoration Activities***

The NPS, California Native Plant Society and several individuals request that the Final Plan provide information on the priorities and timeline for native habitat restoration projects, and recognize the reasonable limits to the land's ability to support large-scale restoration activities. The NPS encourages early implementation of key components of the VMP, and recommends that planning efforts that restore land to its natural state take into account the annual capacity for site restoration. The NPS requests that the Final Plan establish a minimum acreage to be restored annually, and a commitment of resources to accomplish this goal. The California Native Plant Society requests that the Trust clearly state its priorities for open space enhancement during the next 10 or 15 years, and asks whether the Trust intends to restore those areas adjacent to remnant natural areas first.

Response BR-2 – A fundamental concept guiding effective implementation of the VMP is that rehabilitation and restoration occur in a gradual and continual basis. The VMP describes the proposed framework developed to guide this effort successfully, using careful management and understanding of the mosaic of dynamic vegetation resources, including ecological constraints or capacity limitations. Site-and project-based priority-setting will be conducted annually in coordination with other planning efforts, and is dependent in part on budgets, resources, and the ability to generate revenues from other Presidio resources. In 2002, a five-year implementation plan will be developed with the NPS outlining projects and timelines for restoration of the native plant community and rehabilitation of historic forest. It is anticipated that most of the native plant restoration activities occurring within Area B during the next five years will focus on environmental remediation sites, rare plant and sensitive wildlife habitat enhancement opportunities, and serpentine substrates, and will be designed to connect or expand remnant habitats where feasible. Active stewardship efforts will be maintained and, where feasible, expanded on all existing restoration sites, such as the Inspiration Point grasslands. Opportunities to provide continued feedback on VMP and open space project planning and implementation will be encouraged through annual public workshops, site walks, community meetings, and presentations.

BR-3. ***Expansion of Crissy Marsh***

The Crissy Marsh generated more comments than any other issue within the Draft Plan. Commentors, including almost all natural resource conservation organizations, are almost unanimous in their urging of the Trust to "commit to marsh expansion implementation to the extent necessary to ensure its ecological health and natural function." However, several historic preservation groups, such as the California Heritage Council and the Council on America's Military Past oppose extending the wetlands ("by as much as one square inch") at the expense of historic resources. Those in favor of expansion give both facts ("because the Presidio is located along the Pacific Flyway … an expanded marsh area, viable wildlife corridors and protected roosting and foraging areas will reduce the impact that increased use of the Presidio might otherwise have on these species") and figures ("Crissy Marsh should be at least 30 acres to produce a series of connected natural open spaces") to support their request. They ask the Trust to investigate the ecological requirements for marsh expansion independent of constraints imposed by the current land use designations, which should be considered provisional until after a study (followed by peer review and analysis of opportunities and constraints) is complete. The BCDC and others urge that the location of the possible marsh or upland habitat expansion be identified within the Final Plan. Others, like the Untied States Environmental Protection Agency, are more specific, and recommend the removal of the Post Exchange and Commissary buildings, or any other feasible design in either Area A or B. The Urban Watershed Project submitted a map indicating possible areas for expansion. The Native Plant Nursery recommends creating a buffer zone for Crissy Marsh and its expansion to protect the native plant community. Several commentors feel that the analysis in the EIS does not do justice to the potential impacts that the level of demolition and new construction proposed under the Draft Plan could have on the marsh.

Response BR-3 – In response to comments, the Final Plan was revised to be more specific about the Trust's commitment to the long-term health of the Crissy Marsh and the discussion in the EIS was updated accordingly. Since release of the Draft Plan and EIS, the Trust has completed a letter of agreement with the NPS and Golden Gate National Parks Association (GGNPA) that initiated the Crissy Marsh Expansion Technical Study (Crissy Marsh Study). The letter of agreement outlines the commitment of the three signatories to work collaboratively on the study. The Crissy Marsh Study will consider a broad array of options for ensuring the long-term ecological viability of the marsh, including expansion. The Crissy Marsh Study is a technical study. Its findings will be used to inform a subsequent planning and decision-making process that will be subject to NEPA and NHPA compliance and public review.

The Crissy Marsh Study will build on past planning efforts at Crissy Field. The study will be informed by the objectives developed during the original Crissy planning effort and identified in related reports, as well as ongoing monitoring data. The study will summarize the primary factors that threaten the long-term ecological viability of the marsh, identify a broad set of options for addressing those factors, and assess the benefits and impacts of each option using an array of criteria including but not limited to hydrologic function; ecological function; benefits/impacts to known and potential cultural and archeological resources; benefits/impacts to recreational resources, wildlife habitat (type, quantity and quality), sustainability, fundability, maintenance requirements, and costs; benefits/impacts to existing or proposed land uses; consistency with approved plans and policies; and estimated construction costs. The Crissy Marsh Study will look at potential actions within both Areas A and B of the Presidio. The Crissy Marsh Study will provide sufficient technical information to inform subsequent decision-making (subject to public review via the NEPA and NHPA processes).

With respect to the comment requesting establishment of a buffer area, the Final Plan calls for the protection and enhancement of remnant natural features in the Crissy Field (Area B) district, including natural dunes, serpentine, and riparian areas near Doyle Drive, the bluffs, the stables, and the Tennessee Hollow creek corridor. Refer to Chapter Three of the Final Plan for additional discussion of this issue.

BR-4. ***Moratorium on Development in Crissy Marsh Area***

Commentors request that the Trust identify and protect from development an expansion area for the Crissy Marsh by not allowing long-term leases of existing structures, other uses, or new construction that will constrain or otherwise interfere with marsh expansion. The commentors recommend assignment of a special management zone where only short-term leasing could occur until future marsh expansion plans are determined.

Response BR-4 – In response to comments, the Plan was revised and now states that, for the next two years (the estimated duration of the Crissy Marsh Study as described in Response BR-3), the Trust will not undertake any new construction or long-term leasing within the study area. Refer to Chapter One of the Final Plan for additional information.

BR-5. ***Tennessee Hollow Restoration***

A number of commentors feel that restoration of Tennessee Hollow was not sufficiently defined in the Draft Plan, and that the riparian corridor should be fully restored. The commitment should be to restoration, not just evaluation of its feasibility (as stated in the Draft EIS). Commentors state that specific measures are necessary, including a commitment to removing landfills and housing and providing adequate setbacks. They request that no new housing construction be permitted in Tennessee Hollow. Some, like the Golden Gate Audubon Society, feel that the restoration proposal was flawed due to inappropriate surrounding uses that may impinge on those restoration efforts. The NPS requests that any development designations be delayed until the Tennessee Hollow planning process can identify the area for potential restoration.

Response BR-5 – The Final Plan includes a concept consistent with the GMPA for the restoration of the upland drainages and associated riparian corridors, including El Polin Spring, within the Tennessee Hollow watershed. The Final Plan further outlines a plan to connect a system of freshwater streams, freshwater marsh, and brackish water marsh to the bay and ocean through the restoration of Tennessee Hollow and its functioning connection to the Crissy Marsh. The plan is being prepared as a part of a coordinated effort between the Tennessee Hollow Watershed Restoration and Enhancement Project and the Crissy Marsh Study. To support this effort, a multi-organizational effort, including technical representatives from the Trust, the NPS, and the Urban Watershed Project, began watershed hydrology data collection in December 2000. In 2001, planning for Tennessee Hollow commenced with the development of a work plan, dedication of funding for planning and technical studies, and the kick-off forum with the public to provide information and receive feedback regarding of the project.

Through the planning process, many watershed issues, including infrastructure needs, resource values, restoration, visitor opportunities, environmental remediation (i.e., landfill removal), and existing land uses, will be considered and evaluated. A range of alternatives will be developed with input from the public and subject to environmental review. The environmental document will be released for public review and comment, with the anticipated publication of the final plan projected for 2003.

The preliminary goals of the Tennessee Hollow planning effort were presented to the public during a workshop in November 2001. They include restoring a functioning stream ecosystem that contributes to the function of Crissy Marsh; improving watershed management practices; protecting and enhancing cultural and archeological resources; providing and enhancing recreational, educational, and interpretative opportunities in the watershed; and removing, relocating, or adapting existing infrastructure (housing, utilities, roads, or recreation facilities, for example) to showcase sustainable land uses within a watershed.

BR-6. ***Landfills and Morton Street Ballfield***

Several natural resources conservation organizations support thorough cleanup of soil and groundwater contamination, removal of landfills (not merely capping) in Tennessee Hollow and throughout the park, and restoration to native habitat. Commentors request that the Trust commit to the removal of the Morton Street Ballfield within the Tennessee Hollow restoration corridor.

Response BR-6 – The Trust has proposed as its preferred remedial alternative (as part of the Presidio Main Installation Feasibility Study) the removal of Landfills 1 and 2 and Fill Site 6 from Tennessee Hollow. The remedial alternative for Landfill E will be selected by following the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) process, which is separate from the NEPA process but includes consideration of public input, as well as eight other criteria as set forth in the CERCLA regulations. The needs of the Tennessee Hollow restoration planning effort will be given due consideration in this process, and will be weighed against other relevant competing considerations and stakeholder concerns. The remedial alternative selected for Landfill E will be protective of human health and the environment and will comply with all applicable legal requirements. Placing an engineered cover over the landfill and leaving it in place with monitoring and other

controls is one of the remedial alternatives being considered that complies with these legal requirements.

The Morton Street Ballfield is located within the east tributary of Tennessee Hollow and will be considered for possible removal as part of the Tennessee Hollow restoration planning process. The ballfield is currently leased on an interim basis. Upon expiration of the lease, and the completion of the restoration plan, a decision regarding the ballfield will be made.

BR-7. ***Housing Removal in the Tennessee Hollow Watershed***

A number of commentors request that the Trust commit to no future housing construction and the removal of MacArthur housing and Buildings 808, 809, 777, 779, 1029, 1030, 230, and 231 within the Tennessee Hollow watershed.

Response BR-7 – The Trust recognizes that removing key housing units within the watershed is a critical element to establishing habitat connectivity and hydrologic function within the tributaries and associated riparian corridor. In response to public comment, the Final Plan provides more specificity regarding building demolition to accommodate open space/natural resource restoration, replacement construction, and subdivision and conversion activities. This information is provided on a planning district basis, and also includes a new figure. Refer to Chapter Two of the Final Plan and Response HO-14 for additional information on this subject. With respect to further demolition activities that could be necessary for the Tennessee Hollow restoration, this information will be addressed by the alternatives developed and refined through the public planning and environmental review process for that project.

BR-8. ***Special Status Species List***

The SFCTA requests that the Trust clarify the source of the special status species list and the status of the tree lupine moth.

Response BR-8 – The sources used in compiling Tables 4 and 5 in the EIS (special status species list) are noted at the bottom of each table. The tree lupine moth has been de-listed and is therefore not included in Table 5.

BR-9. ***San Francisco Owl's Clover and Isolated Wetlands***

The NPS requests that the VMP zoning be amended to protect the recently discovered San Francisco owl's clover population north of the Log Cabin in Fort Scott and isolated wetlands in these areas. The California Native Plant Society is encouraged by Trust efforts to manage the area for this species and its associates ("the flexibility demonstrates the Trust's readiness to alter land use designations in light of new information or opportunities"). The USFWS requests that the EIS discuss the significance of the owl's clover population.

Response BR-9 – The Presidio's plant populations and vegetation communities evolve dynamically both spatially and temporally, as noted in the VMP. Additionally, many have been fragmented, leaving small vestiges scattered throughout the Presidio. Because of this, it is difficult to include each new or outlier native plant resource or wetland vestige within the larger VMP native plant community zone. That, however, does not reduce the level of commitment that will be afforded to those resources. The Trust shares the NPS commitment to maximizing native plant recovery and ensuring wetland protection and, is confident that protection measures and best management practices (BMPs) identified within the Final Plan and EIS will ensure protection, and to the extent feasible, restoration of these resources. Both the Final Plan and EIS acknowledge the unique value of these resources. A planning guideline for Fort Scott states, "Restore natural resources along Dragonfly Creek and wetland and rare plant habitat northwest of the Fort Scott parade ground." The EIS has been revised to state "...populations of both the San Francisco gumplant and San Francisco owl's clover are found in the developed sections of the Fort Scott Planning District." BMPs will be implemented within and adjacent to these areas, and for other outlier native plant and vestige wetland resources, to protect them and their associated habitats. These BMPs will be developed such that the management of these resources will be consistent, to the extent feasible, with the objectives set forth in the VMP for the native plant community zone.

Table 4 and the Affected Environment (Section 3.3.1) of the Final EIS discuss the significance of the owl's clover.

With respect to the treatment of isolated wetlands, the Trust plans to manage all wetlands consistent with the planning principles included within the Final Plan. Future planning efforts will pursue no net loss of existing wetland

features. Additionally the Trust is committed to developing further details, guidelines, and policy consistent with these principles as the Trust undertakes site-specific planning. The Trust will also undertake compliance steps, including obtaining any necessary permits under Clean Water Act Section 401, 402 and 404 programs when applicable. To further clarify the Trust's commitment to wetland resource protection, the EIS text was also revised to better express the application of protection measures and strategies to isolated wetland features not located within the native plant community zone of the VMP. Additional mitigation measures in the Draft EIS (notably Mitigation Measures NR-4, NR-5, and NR-6) identified actions that will further limit potential impacts on these resources.

BR-10. ***Impacts on Wildlife***

Several commentors request that the EIS provide further assessment of the impact on wildlife species and habitat. One individual requests that the Trust provide more education to residents about pet and garbage problems, as well as reduce non-indigenous predator pressures. The NPS asks that the EIS be expanded to address the degree to which wildlife habitat values are reduced as areas are developed, and requests further assessment of effect of visitor numbers, the kinds of recreational facilities, and proximity to habitat. The NPS also questions why the Resource Consolidation Alternative will have the most beneficial effect on wildlife movement. The NPS notes that an increase in open space acreage can only be assessed as a benefit if the specific characteristics of that acreage in relation to wildlife values are assessed.

Response BR-10 – The Draft EIS provided an analysis of the direct and indirect effects on wildlife, effects on nesting habitat, and effects on wildlife movement, as well as a focused discussion on potential impacts on special status wildlife. This analysis considers and describes the relative effect of proposed use levels (i.e., visitors), building demolition, and construction under each of the PTMP alternatives. Conclusions about the impact analysis were based upon general conservation biology principles. The condition and health of any potentially affected habitat, and the benefits accrued to wildlife and wildlife movement, will be further evaluated on a case-by-case basis during future site-specific planning. Refer to Section 4.3.1 of the EIS for a detailed discussion of these issues, as well as Response WR-7, which addresses changes in the proposed land uses under Final Plan that were made in response to public comment on the EIS analysis.

The Trust concurs with the importance of resident education programs. Current outreach efforts regarding wildlife protection include the use of educational mailers and "pet agreements," which are required for Presidio tenants with pets. An example of a recent mailer was the provision of a "trash clip" for outdoor garbage cans and an explanation of the importance in preventing wildlife access to garbage receptacles. Under Mitigation Measure NR-5, the EIS identifies further actions, including the use of interpretative materials and signage in areas where an increase in tenant/visitor use is expected and natural habitat or sensitive areas are nearby, as well as use of buffer areas and other actions to minimize the impact of human use of the park on biological resources. Also refer to Chapter One of the Final Plan.

The Resource Consolidation Alternative provides the greatest increase in contiguous open space habitats, including native plant, forested, and landscaped areas, all of which support varying levels of wildlife richness and habitat. The conclusion stated in the EIS was based primarily on the following:

- Application of conservation biology principles, including the relationship of patch size to species diversity.
- Preliminary interpretation of data indicating that forest and landscaped areas within the Presidio also provide valuable wildlife habitat.
- The fact that species are less likely to become extirpated if they are well distributed across a range, and if blocks of habitat are large and interconnected with other suitable habitat. Population persistence increases with the number and size of sub-populations.
- The understanding that the location of any new residential construction, beyond that specifically identified in the housing plan, will only occur and be evaluated after efforts to replace units in existing building are exhausted.

The Trust acknowledges the importance of continued wildlife monitoring and data collection necessary to inform future site-specific planning efforts, and is currently working with the NPS, Point Reyes Bird Observatory and Audubon Society to collect more detailed avian data. These and other pertinent monitoring efforts will continue as necessary to inform future planning. The

Trust also recognizes the wildlife impacts caused by non-indigenous predators, and is committed to controlling wildlife pests when necessary to protect native species. The Trust is committed to increasing the amount of contiguous open space at the Presidio by restoring and enhancing native plant habitat, forests, wetlands, and drainage corridors, which will increase the amount of contiguous open space, improve wildlife habitat, and create corridors for animal movement.

BR-11. ***Identification of Serpentine Areas***

Several commentors urge the Trust to identify and document serpentine areas. The California Native Plant Society asks that immediate efforts be undertaken to identify serpentine soils throughout the Presidio. San Francisco State University also urges that restoration efforts begin to link the two fragmented rare serpentine grassland habitats at the Presidio. One individual supports protection and ecological restoration of remnant serpentine prairie on both sides of Highway 1/Doyle Drive.

Response BR-11 – The Trust concurs that additional data collection and survey efforts will be required to help guide future long-term planning restoration priorities for serpentine communities and associated special status species recovery. To do so is a natural resource priority. Several commentors also noted that targeted soil surveys should be completed within the East Washington housing area to better delineate potential serpentine habitat that could be enhanced by strategic building demolition. The Trust will conduct studies in this region to better inform building demolition decision-making efforts.

During 2001, the Trust and NPS worked in partnership with San Francisco State University to refine soils maps necessary for serpentine grassland restoration within the Inspiration Point area. It is anticipated that future serpentine soils and outcrop mapping efforts would build upon this partnership, targeting the golf course, East Washington housing area and the remnant prairie habitat north and south of Doyle Drive. A strategy for accomplishing the first phase of this serpentine soil mapping, as well as for protecting existing prairie habitat, is currently under development, with implementation following dependent upon funding. In addition, expansion of two fragmented grassland habitat areas is currently underway. Revegetation of several acres of new habitat at Inspiration Point is in progress, and habitat near the World War II Memorial will also be created during landfill removal activities in 2002.

BR-12. ***Resolving Conflicts***

The USFWS requests that the EIS state, in all relevant contexts, the dual aspects of non-native trees as historic/cultural resources, and invasive alien species subject to Executive Order 13112. The California Native Plant Society asks for an analysis that recognizes conflicts between natural and cultural factors or establishes guidelines for resolving such conflicts.

Response BR-12 – The VMP is the comprehensive guide used by both the NPS and the Trust in managing Presidio vegetation. The VMP is the result of a multi-year planning, public input, and environmental review process. Inherent in the zoning established in the VMP is a recognition and understanding of the multiple resource values provided by the various vegetation types at the park – landscape vegetation, historic forest, and native plant communities (as well as the Special Management Zone set aside as a placeholder until the USFWS prepares its Final Recovery Plan for Coastal Plants of the San Francisco Peninsula). The scope of the VMP is broad and responds to an array of objectives and mitigation requirements, including balancing sometimes competing demands between rehabilitation of the non-native historic forest and the cultural landscape, and protection and management of special status plant species. In response to this comment, a footnote was added to Figure 23 of the Final EIS to reference readers to the adopted Presidio Vegetation Management Plan (VMP) for a discussion of relevant management actions for each vegetation zone within the park.

BR-13. ***Miscellaneous Specific Comments***

The NPS and others make miscellaneous "specific" comments on biological resources impacts that are treated individually below.

- ***Crissy Marsh Expansion*** – The NPS requests that more assessment be focused on the potential impact on the Crissy Marsh if the expansion does not take place.

Response BR-13 – In response to the comment, the EIS was revised to include a discussion of these potential biological impacts. In general, if the marsh

closes for a period of time, altering the marsh environment's salinity and water inundation footprint and frequency, the tidal marsh vegetation communities could be lost, and the re-introduction efforts for the federally endangered California sea-blite may be affected. Additional impacts on wildlife species will also occur if the Crissy Marsh continues to close for significant periods of time, altering the tidal marsh vegetation communities. Foraging potential, species richness, and nesting habitat will all be affected, as will the movement of aquatic invertebrates and fish. Water quality, temperature, and concentrations of suspended sediments and nutrients will all be influenced, and changes could affect reproduction of aquatic organisms. The NPS, the Trust, and the Golden Gate National Parks Association are committed to the long-term health of the marsh and are undertaking the Crissy Marsh Study to consider a number of options, including expansion of the marsh, for ensuring its long-term ecological viability. Refer to Response BR-3 for additional discussion of marsh expansion. Therefore, under the EIS alternatives these impacts are considered remote and speculative, and are only discussed under the Minimum Management Alternative.

- ***Summary Table*** – The NPS states that the summary table in the EIS should reflect that the No Action Alternative (GMPA 2000) will have fewer adverse biological impacts than the other alternatives. The NPS also questions some of the conclusions reached in the summary table with regard to the Sustainable Community and Cultural Destination Alternatives.

Response – In response to these and other comments, the summary table has been revised. Refer to Response EP-25 for additional discussion.

- ***Short Term Impacts*** – The NPS does not concur that the construction and demolition actions of the No Action Alternative (GMPA 2000) will significantly disrupt wildlife movement given the degree and effectiveness of the mitigation measures applied to reduce potential effects. The NPS requests that the EIS be corrected to state that temporary disruption could occur during demolition but that mitigation will reduce the impact.

Response – The Draft (and Final) EIS does not suggest that the No Action Alternative (GMPA 2000) will significantly disrupt wildlife movement. Section 4.3.1 of the EIS states:

> "Wildlife corridors would benefit from the native plant habitat restoration and enhancement, forest restoration and wetlands and drainage corridor restoration that would occur under this alternative. At the same time, activities associated with the 1.1 million sf of demolition and 170,000 sf of new (replacement) construction, to the extent that they occur in or adjacent to wildlife corridors, could disrupt wildlife movement and migration. Intensive activities, including recreation and special events, in or adjacent to wildlife corridors, could also be disruptive. Future site-specific planning and environmental review would take into consideration and promote wildlife corridors, especially as the focus of habitat restoration activities, wherever feasible and beneficial for the resource, to reduce potential impacts."

The Trust believes that this discussion is accurate and that no text change is needed.

- ***New Construction under the No Action Alternative (GMPA 2000)*** – The NPS states that the conclusion that "demolition, new replacement construction, and land uses" under the No Action Alternative (GMPA 2000) will affect native plant communities is incorrect, since there is no "replacement construction" proposed as a part of the No Action Alternative (GMPA 2000). The areas of new construction under the No Action Alternative (GMPA 2000) do not support native plant communities, so the effect will not occur.

Response – It is conceivable that unforeseen or inadvertent impacts could occur within adjacent native habitats even with the implementation of mitigation measures. The No Action Alternative (GMPA 2000) proposes 170,000 square feet of new construction. The text has been revised in the Final EIS to delete the word "replacement" from the section in question.

- ***Phasing of Wherry Housing Removal*** – The NPS states that the EIS should assess the degree of impact on special status plants of the longer phasing of Wherry Housing removal in the alternatives.

Response – The Trust believes that there will be no long-term impact on special status plants. The phasing of Wherry Housing removal (one-third by 2010, one-third by 2020, and the remaining third by 2030) will enable the timely phased restoration and integration of the core habitat between the Lobos and Wherry Dune lessingia sites. The Trust has begun Section 7 consultation with the USFWS under the Endangered Species Act and has submitted a Biological Assessment that outlines the phased demolition. It is anticipated that the USFWS will provide a Biological Opinion regarding the analysis and conservation measures provided within the assessment and EIS. The Trust is also providing comments to the USFWS on the Draft Recovery Plan for Coastal Plants of the San Francisco Peninsula regarding implementation feasibility.

- ***Level of Detail*** – The NPS states that biological resources described in specific detail in the Affected Environment section should also be analyzed at the same level of detail in the Environmental Consequences section of the EIS.

Response – Text within the alternatives analyses describes the locations where differences occur among alternatives that could result in impacts. The analyses considered the respective acreage and habitat type or condition when information was available. Also refer to Response EP-22.

- ***VMP FONSI*** – The NPS states that the EIS should state that the restoration strategies and mitigation measures in the VMP were adopted by the Trust through the signing of a Finding of No Significant Impact (FONSI) by the Trust Executive Director.

Response – The text in the Final EIS was revised to reflect adoption of the VMP, which occurred after release of the Draft EIS.

- ***Mitigation Measure NR-12*** – The NPS requests that the intent of Mitigation Measure NR-12, which requires that "disturbance to natural habitat areas will not exceed 20 acres within any given year," be made clear.

Response – This mitigation measure was developed to ensure both short-term and long-term protection and enhancement of natural resources from cumulative impacts that could occur as the result of the implementation of the VMP, PTMP, environmental remediation construction, trail construction, and other planning and implementation activities on the Presidio. The intent is to reduce the amount of cumulative disturbance to natural areas that could occur at any one time, thereby reducing significant disturbance to wildlife corridors, propagule production, and other important natural resource functions.

- ***Resource Consolidation Alternative*** – The NPS requests that additional information be provided to support the statement that the Resource Consolidation Alternative will have the greatest beneficial effect on wetlands.

Response – The Resource Consolidation Alternative is the only alternative that calls for demolition of the Public Health Service Hospital complex and West Washington housing. Actions proposed under this alternative will reduce edge pressures and habitat fragmentation in the South Hills planning district, specifically in wetland features located north of the Public Health Service Hospital and west of West Washington housing.

- ***Indirect Impacts*** – An individual requests that the EIS address the impacts of subdividing housing in the South Hills planning district.

Response – Indirect impacts on native animals and wildlife habitat could include visual and noise impacts from human activities as well as trampling damage from human and pet access and predation by domestic and feral cats and dogs. The increase in the number of residents could also result in the disturbance to native plant communities and have reduced ecological benefits. These impacts were previously addressed in the Draft EIS.

- ***Impacts of Recreational Uses*** – An individual requests that the EIS discuss the impacts of active recreational sites on natural restoration opportunities.

Response – The Biological Resources Environmental Consequences section addresses the potential impacts from increased land use pressures including recreational uses.

- ***Reducing Biological Impacts*** – The Bay Conservation and Development Commission requests that the Trust reduce building areas and specify minimum widths for wildlife corridors, buffers, and habitat areas in order to reduce biological impacts. The agency also states that additional policies should be included in the Final Plan to reduce light and noise impacts.

Response – The adopted VMP as reflected in the Final Plan establishes a native plant communities zone designed to mitigate impacts through the creation of viable ecological corridors. The VMP favors larger contiguous corridors (with fewer edges) to allow more sustainable management. Concepts of "edge" management and vegetation transition were important factors in delineating the corridors. These corridors will improve and better protect wildlife movement by linking existing remnant natural areas, creating open space buffers, and establishing connections to important habitats. The Final Plan also provides guidance for light and noise management related to sensitive wildlife and other natural resources. (Refer to Chapters One, Three and Four in the Final Plan for additional detail.)

BR-14. ***Minor Text Corrections***

Several commentors recommend changes to the text of the EIS. These comments are discussed separately below.

- ***Artificial Lighting*** – The NPS requests that the phrase "where necessary" be deleted after "shield the use of artificial lighting."

Response – The EIS has been revised as requested.

- ***Lessingia Populations*** – The USFWS requests that the EIS clarify the number of San Francisco lessingia populations or sites.

Response – As requested, the EIS has been revised to state that the Presidio populations of the San Francisco lessingia are currently located at six sites. The EIS has also been revised to better describe species-specific requirements.

- ***Raven's Manzanita*** – The USFWS notes that the single natural surviving individual of Raven's manzanita was rediscovered by Peter Raven in the early 1950s, and was quite mature at that time. Therefore it is considerably more than "over 30 years old."

Response – The EIS text has been revised to reflect the comment.

- ***Presidio Clarkia*** – An individual observes that Table 4 on page 102 of the Draft EIS incorrectly states that Presidio clarkia is found in Area A.

Response – The Trust appreciates the careful review of the EIS, and has incorporated the change.

- ***Text/Table Inconsistencies*** – The SFCTA observes that there are inconsistencies between text descriptions and species included in various tables. For example, species such as the salt marsh yellow throat and yellow warbler are mentioned in the text, but are not included in the appropriate table.

Response – Table 6 identifies special status marine species that may be potentially affected by activities in Area A and Area B. The three bird species were included because of human activity in foraging areas. Table 5, however, is a summary of the occurrence and potential occurrence of special status wildlife species on the Presidio. The Final EIS has been revised to include the saltmarsh yellowthroat and loggerhead shrike in Table 5.

- ***Pre-Colonial Landscape*** – The USFWS requests that the description of the pre-Colonial landscape of the Presidio in the EIS be revised.

Response – The Trust appreciates the careful reading of the EIS by the USFWS, and has incorporated the information provided in the USFWS comment letter in the final document.

4.14 LAND USE (LU)

CONTENTS

LU-1. *Consistency with the GMPA*

LU-2. *Consistency with the San Francisco Bay Plan*

LU-3. *Consistency with the San Francisco General Plan*

LU-4. *Proposition M*

LU-5. *Environmental Remediation*

LU-1. *Consistency with the GMPA*

A Presidio advocacy group requests that the EIS include an analysis of the consistency of the Final Plan Alternative with the GMPA. The same group also asks for an analysis of all text sections in the GMPA that are proposed to be changed.

Response LU-1 – In general, the PTMP planning principles that would guide the Trust's efforts to protect and manage the park are consistent with the GMPA's specific objectives, including those under stewardship and sustainability, community service and participation, visitor use and enjoyment, resource management, transportation, sustainable design and conservation practices, orientation and accessibility improvements, interpretation and education, and sustainable design and conservation practices. The PTMP's primary emphasis on protecting and enhancing park resources narrows the GMPA's vision of the park as a global center, as discussed elsewhere in response to comments. To the extent that the Trust's tenant selection criteria would allow a broader group of tenants, including not just those who could "build on the historical role of the Golden Gate as a crossroads of international exploration, cooperation and exchange," the alternatives (with the exception of the No Action Alternative (GMPA 2000) and Final Plan Variant) would broaden the GMPA's cross-cultural and international cooperation emphasis (page 26 of the GMPA). The PTMP's goal of collaborative interpretation, whereby the Trust's programmatic contributions would supplement those of the NPS and park tenants, would also broaden the GMPA's interpretation and education objective (page 29 of the GMPA), which only provides for NPS/tenant interpretive and education programs. Finally, the PTMP's provision that would allow some new construction of housing on infill sites would update the GMPA's residential use provisions, which do not support replacement housing (page 50 of the GMPA).

Other policy differences between the GMPA and the PTMP are described through these responses to comments, including responses related to the planning guidelines, which describe similarities and differences within each planning district. Also, in response to comments on the Draft EIS, the Land Use discussion within the Environmental Consequences section of the EIS has been expanded and revised to clarify changes in expected land uses between each alternative and the No Action Alternative (GMPA 2000).

With regard to the commentor's suggestion that all text sections of the GMPA that are proposed for change be described in the EIS, the Trust considered this suggestion but did not adopt if for reasons of practicality, essentially because the tiered evolution of the documents does not lend itself to that sort of line-by-line treatment. The PTMP is an update of the GMPA in its entirety (as it applies to Area B), and evolved from the GMPA, which provided much of the basis for the policy statements and land use provisions of the PTMP.

LU-2. *Consistency with the San Francisco Bay Plan*

The Bay Conservation and Development Commission (BCDC) requests that the EIS discuss the Coastal Zone Management Act, relevant policies in the San Francisco Bay Plan, and the consistency determination process.

Response LU-2 – In response to the comment, the text of the Final EIS has been amended to include a discussion of the San Francisco Bay Plan as an approved plan with policies affecting the Presidio. Refer to Section 3.4 of the Final EIS. Since the publication of the Draft EIS, the Trust met with BCDC staff on several occasions to review their concerns regarding Trust programs and activities that could affect the coastal zone management program, and prepared a consistency determination on the Trust's proposed activities related to the PTMP. See Section 5.2 of the Final EIS. The consistency determination

concludes that the PTMP (1) is consistent with the Bay Plan (which designates the Presidio as a park priority use area and states that the shoreline and the undeveloped areas in the Presidio should be retained as a regional park); and (2) if implemented, would be consistent with the BCDC's coastal management program by increasing open space and recreational opportunities, preserving historic resources, rehabilitating native vegetation and riparian areas, preserving and enhancing Bay views, protecting water quality, establishing a network of trails and bikeways through the Presidio, and encouraging public transportation demand management strategies.

LU-3. ***Consistency with the San Francisco General Plan***

The CCSF Planning Department and a Presidio advocacy group request that the Final EIS analyze the consistency of the Final Plan Alternative with policies contained in the San Francisco General Plan.

Response LU-3 – As discussed in Section 3.4.1 of the Draft EIS, the Presidio is a federal enclave within the City and County of San Francisco, and local land use plans, policies and regulations are inapplicable to these federal lands. While the CEQ NEPA Regulations require that an EIS discuss possible conflicts between a federal action and land use plans "for the area concerned" (40 CFR Section 1502.16 (c)), the Presidio's land use plan for the area concerned is currently the NPS GMPA. Nevertheless, this section of the EIS describes the San Francisco General Plan, including the policy of the Recreation and Open Space Element that calls for preservation of the Presidio and its resources. In response to the comment, the Final Plan is described further in relationship to the San Francisco General Plan.

The San Francisco General Plan designates the Presidio as "P" for Public Use and identifies Area B as "Open Space Area" and "Developed Area" (Map 3). Specifically relative to the Presidio, Policy 5 of the Recreation and Open Space Element calls for the preservation of the open space and natural, historic, scenic, and recreational features of the Presidio, and recommends various guidelines to apply to new development and land use changes. The relationship of the Final Plan Alternative to these guidelines is described below.

New Structures – Guidelines and procedures in the Trust's Final Plan would ensure that any new construction is located and sized appropriately as called for in the CCSF's Guideline 1, which states that "no new structures should be built that would adversely affect the scenic beauty and natural character of the Presidio."

New Construction – Similar to language in the Presidio Trust Act and the Final Plan, the CCSF's Guideline 3 recognizes removal and/or replacement of some structures within the Presidio as a management option. ("New construction should be limited to replacement of existing structures with an improvement of similar size.")

Open Space Areas – Conformance with the objectives and zoning set forth in the Presidio's adopted Vegetation Management Plan would promote "a balanced approach to maintenance of the forest resource and restoration of the native vegetation communities" as called for in the CCSF's Guideline 7.

Historic Structures – Guidelines in Chapter Three of the Final Plan would ensure that the size, scale, location, and design of new construction would be compatible with the Presidio's historic setting and the character of the area. These guidelines and preservation, rehabilitation, and use of historic buildings and landscapes in accordance with The Secretary of Interior's Standards for the Treatment of Historic Properties and the Guidelines for Rehabilitating Buildings at the Presidio of San Francisco would promote the CCSF's Guideline 6, which suggests that "historic structures and sites should be preserved."

Hiking and Bicycle Trails – Implementation of a joint NPS/Trust Presidio Trails and Bikeways Master Plan currently under preparation would be responsive to the CCSF's Guideline 8, which recommends improvements to the recreational trail system. ("The system should include well designed and marked hiking and bicycle trails through the Presidio. Points of historic interest should be marked. A shoreline trail should link Seacliff with the Marina.")

Housing – Replacement construction of housing at the Presidio (projected at between 200 and 400 units total) would not address the CCSF's Guideline 2, which states that "no additional housing units should be constructed in the

Presidio." However, replacement housing would support numerous other General Plan policies, especially those in the Residence Element that emphasize protection and enhancement of the city's housing stock.

As noted routinely in environmental documents prepared by the CCSF, consistency with the General Plan requires careful consideration of often competing policies and objectives. Thus, the Final Plan's apparent inconsistency with one policy should not be viewed as an overall inconsistency with the General Plan. As noted in the CCSF's comments on the Draft Plan, "there are numerous policies that support preservation of the existing housing supply, and the City supports the concept of no net loss of housing."

LU-4. ***Proposition M***

A Presidio advocacy group requests that the Trust identify what impact the Plan would have on Proposition M (November 1986), the city growth control measure.

Response LU-4 – The CCSF is responsible for interpreting the local voter initiative known as Proposition M, which sets an annual limit on the amount of new office space approved in San Francisco. Office space on federal property is not required to compete for approval (i.e., in the "beauty contest"), as would an office project under CCSF jurisdiction. However, the Trust understands that as federal office space comes on-line, it can affect the amount of office space that the CCSF, acting under its own laws, can approve in a given year. The Presidio was still the property of the Army when Proposition M was approved, and many of the buildings were in use by the military as office space. The question of whether occupancy of office space at the Presidio constrains the amount of office space the CCSF approves on an annual basis under Proposition M is a matter within the purview and jurisdiction of the CCSF, not the Trust.

LU-5. ***Environmental Remediation***

A member of the Presidio Restoration Advisory Board (RAB) is concerned that the PTMP's proposed changes in land use may affect environmental clean-up sites within Area B and asks whether an analysis concerning the impact of the land use changes on proposed remedial actions has been performed with regard to contamination clean-up levels. The individual notes that the existing clean-up levels have been developed in specific regard to the land use proposed in the GMPA. Another individual questions costs, schedule, and public review of clean-up sites, and the role of the RAB.

Response LU-5 – The commentors are referred to the discussion of human health, safety, and the environment in Appendix A (page A-6) of the EIS. As discussed, the Trust's clean-up of non-petroleum substances, pollutants, and contaminants on the Presidio is addressed through compliance with federal and state pollution clean-up laws that include environmental data collection, analyses, remedial design and implementation, and reporting and documentation requirements separate from the PTMP and associated NEPA process. The clean-up of contaminated sites within the Presidio is still in progress. As noted by the commentor, clean-up levels are being developed to follow the land use designations set forth in the GMPA. Numerical clean-up standards are now being established for land use types (e.g., residential, recreational, commercial, etc., as well as ecological). These standards will apply to each location proposed for development. If there are changes in land use resulting from PTMP implementation, the remediation goals could change if a clean-up standard that applies to the new land use is either less or more stringent. New information regarding the Trust's clean-up program is being evaluated as it becomes available.

Public comment on the remediation goals, costs, and schedule of activities is addressed through the clean-up process itself rather than through this NEPA process. The RAB routinely consults with the Presidio Trust, state agencies, and the NPS regarding clean-up of the Presidio. The RAB meets twice per month, and every second Tuesday is the official RAB meeting that is open to the public.

4.15 VISUAL RESOURCES (VR)

CONTENTS

VR-1. *Impacts of Dune Restoration on Scenic Views*

VR-1. *Impacts of Dune Restoration on Scenic Views*

The USFWS requests that the EIS explicitly relate dune habitat restoration and impacts on scenic or important views, identifying joint benefits, particularly where views of the Golden Gate are relevant.

Response VR-1 – As discussed in the Section 4.3.3 of the EIS (Visual Resources), where existing structures are removed and native plant communities reestablished, there would be a positive effect on visual resources. The most dramatic example would be the removal of Wherry Housing to provide native plant habitat under all alternatives except the Minimum Management Alternative. The text in the EIS relating to this discussion has been clarified.

4.16 AIR QUALITY AND NOISE (AQ)

CONTENTS

AQ-1. *Noise Methodology*
AQ-2. *Heavy Equipment Emissions*
AQ-3. *Effects of Increased Bus Traffic and Secondary Effects*
AQ-4. *Special Events and Programs*
AQ-5. *Effects of Noise on Wildlife Areas and Cultural Landscapes*
AQ-6. *Traffic Noise Monitoring and Attenuation*
AQ-7. *Consistency with the Clean Air Plan*
AQ-8. *Applicability of the Federal General Conformity Rule*
AQ-9. *Air Quality Conditions and Monitoring and California State Visibility Standard*
AQ-10. *Doyle Drive Noise-Sensitive Areas*
AQ-11. *Precursor Pollutants*
AQ-12. *Cumulative Impacts*
AQ-13. *Miscellaneous Specific Comments and Minor Text Corrections*

AQ-1. ***Noise Methodology***

The NPS Pacific Great Basin Support Office requests that the Trust reference NPS policies related to noise management and natural soundscapes.

Response AQ-1 – NPS management policies apply only to the NPS. The Trust has carefully reviewed the referenced policies, and has designed its noise control regulations and program based in part on these and other agency procedures (such as those found within the Federal Highway Administration regulations and the San Francisco Noise Ordinance). A fundamental component of the NPS policy for soundscape preservation is the obligation to protect the natural soundscape to a level consistent with park purposes. The Trust acknowledges NPS goals of soundscape preservation and noise management in its inventory and protection of noise-sensitive areas within the Presidio, in Sections 3.3.5 and 4.3.1 (Mitigation Measure NR-8) of the Final EIS.

AQ-2. ***Heavy Equipment Emissions***

The NPS Pacific Great Basin Support Office seeks clarification of how heavy equipment construction emissions are included in the Bay Area Air Quality Management District's regionwide inventory.

Response AQ-2 – The California Air Resources Board OFFROAD model[1] is the basis of emissions estimates for heavy equipment construction activity state-wide. The model considers the quantity and activity of construction equipment, along with the effects of regulatory programs to control emissions, in calculating annual emissions for each county. The quantity of construction equipment is anticipated to grow 17 percent from 1990 to 2010. The BAAQMD uses the OFFROAD model to estimate emissions from construction equipment activity in the County of San Francisco and includes year-by-year growth in construction equipment in the regionwide inventory.[2]

AQ-3. ***Effects of Increased Bus Traffic and Secondary Effects***

Several commentors, including the CCSF Planning Department, request that the Final EIS discuss the effects of increased bus traffic on local air quality, regional emissions, and noise in nearby city neighborhoods. The CCSF Planning Department points out that mitigation proposed for air quality violations states that the Trust "would coordinate land uses to avoid conflicts due to odors and toxic air contaminants and would implement transportation control measures (TCMs) contained in the Clean Air Plan (CAP)," without mentioning specific odors or toxic air contaminants in the Affected Environment Section of the Draft EIS. The CCSF Planning Department

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[1] California Air Resources Board, Public Meeting to Consider Approval of California's Emissions Inventory for Off-Road Large Compression-Ignited (CI) Engines (>25 hp), Mail-Out#: MSC 99-32. January 2000.

[2] Personal Communication, Michael Nguyen, BAAQMD. February 2002.

observes that reliance on compliance with existing regulations and monitoring does not substitute for impact analysis of potential air quality effects of the Final Plan. The CCSF Planning Department also requests that the Final EIS address the secondary environmental effects on air quality and noise that might occur from implementation of mitigation measures. They mention that one of these secondary effects is the increase in transit traffic, particularly on nearby residential streets. They recommend measures such as design changes, reduction in project size, or a decrease in building square footage through demolition to reduce air quality emissions and construction impacts, or relocation of project elements to disperse the impacts of potential pollution.

Response AQ-3 – The air quality and noise analyses of the Final EIS each account for increased bus traffic. The localized concentrations (Table 36) and emission estimates (Table 37) reflect increased activity of all vehicle types, including autos, trucks, and heavy buses, similar to what would occur throughout the city. Estimates of future noise levels in nearby neighborhoods (Table 38) also reflect increased activity of all vehicle types at the Presidio, including buses. The discussion of transportation and circulation in Section 4.5.5 of the Final EIS reveals that capacity on the Muni system should be adequate to serve much of the increased transit ridership, minimizing new impacts on city neighborhoods.

Odors and toxic air contaminants occur presently at the Presidio, as discussed in Section 3.3.4 of the Draft EIS. The comment is noted, and the discussion in the Affected Environment (under Local Source Inventory) has been revised in the Final EIS.

Programs to manage odors and toxic air contaminants from future development must be implemented concurrently with development. Future coordination of land uses (Mitigation Measure NR-21) is appropriate because the effects of odors or toxic air contaminants can be extremely localized and can depend on small-scale details of the development that have not been finalized at this programmatic stage. Similarly, future monitoring of traffic noise (Mitigation Measure NR-25) is appropriate because traffic noise impacts depend on the pace of new development and trends in regional and pass-through traffic that are not within control of the Trust.

With regard to secondary effects, implementing the Final Plan and the Transportation Demand Management program would reduce single-occupant motor vehicle traffic by both reducing the number of total trips generated and shifting single-occupant traffic to a combination of modes, including transit as well as pedestrian and bicycle modes. This means that some air quality and noise effects from transit activity would be offset by reductions in single-occupant vehicle traffic. As discussed above, transit capacity presently exists to accommodate a substantial portion of the new transit trips, and the air quality and noise analyses of the Final EIS reflect growth in transit traffic along with the traffic of other types of vehicles. Within the Presidio, quiet transit vehicles would be encouraged (Mitigation Measure NR-24).

Design changes or a reduction in project size would not be necessary because other more reasonable mitigation measures to minimize air quality and noise impacts (such as basic control measures for dust emissions and transportation control measures, as identified in the Final EIS) are available. Relocation of project elements for improved dispersion of air pollution is also not necessary because, as shown in Section 4.3.4 of the Final EIS, no localized violations of air quality standards would occur. Nonetheless, alternatives considered in the Final EIS provide the opportunity for readers to compare the relative impacts if overall square footage is reduced, or if square footage is relocated within park boundaries.

AQ-4. ***Special Events and Programs***

The CCSF Planning Department notes that the potential impacts from noise caused by special events or programs has not been addressed in the Draft EIS.

Response AQ-4 – The noise effects of special events would vary widely depending on the intensity of the activities, the location, and the accessibility of the venue. The effects of noise from special events on natural soundscapes are addressed in Section 4.3.1 of the Final EIS (Mitigation Measure NR-8). Section 4.3.5, Environmental Consequences, in the Final EIS has been revised to incorporate new text to address the effects of noise from special events on tenants and visitors. In general, most of these special events are expected to be smaller outdoor seminars, lectures, festivals, exhibits, demonstrations, or hands-on participation that would have limited or no substantial noise effects. Major sound

amplification systems or other major stationary sources of noise for outdoor special events are not anticipated.

AQ-5. ***Effects of Noise on Wildlife Areas and Cultural Landscapes***

The NPS and a neighborhood organization request that the Final EIS discuss the effects of noise on wildlife. The NPS Pacific Great Basin Support Office also requests that applicable noise levels be provided for the Presidio's undeveloped areas, and that the noise level goal for these areas be below 50 dBA to keep these areas as quiet as possible to preserve the natural and cultural landscape of the park.

Response AQ-5 – The effects of noise on wildlife are difficult to define and the effects of changes in the noise environment on wildlife would also be difficult to define. This is because traffic noise currently effects the noise environment in many natural areas of the Presidio. The response of wildlife to noise depends on the duration and characteristics of the noise along with the noise sensitivity of the species, the sensitivity of individuals in the species, the species' activities at the time of the noise (e.g., nesting, foraging), and the potential for habituation. For these reasons, the Trust has not identified nor established noise thresholds or standards for wildlife. Nonetheless, the Trust is committed to protecting relatively large and undeveloped areas with high habitat values (such as Tennessee Hollow, Mountain Lake, and Lobos Creek) and cultural landscapes (such as the Fort Scott parade ground, the San Francisco National Cemetery, and the World War II Memorial) as noise-sensitive areas. Please see Planning Principle 9 in Chapter One of the Final Plan.

AQ-6. ***Traffic Noise Monitoring and Attenuation***

The NPS recommends monitoring traffic noise in areas of high wildlife habitat value and in natural areas used for quiet contemplation.

Response AQ-6 – The majority of new activity would be limited to built areas. Noise levels would be monitored in any noise-sensitive areas used for quiet contemplation that could be exposed to substantially increased future traffic noise (Mitigation Measure NR-25). Natural areas and areas of high wildlife habitat value that are separated by distance or shielded from roadways would not experience substantial changes in noise levels because new activities at these locations would be limited to habitat restoration (a short-term activity). Therefore, noise monitoring would not be warranted in these areas. Section 4.3.1 of the Final EIS addresses monitoring Trust activity on a project-specific basis to protect natural soundscapes (Mitigation Measure NR-8).

AQ-7. ***Consistency with the Clean Air Plan***

The EPA recommends that the Final EIS demonstrate that the Trust has coordinated with the BAAQMD in incorporating new housing and employment projects in future regional Clean Air Plan updates. The NPS Pacific Great Basin Support Office comments that there is no guarantee that the BAAQMD will approve emissions related to proposed long-term growth and daily vehicle trips given its deadlines for meeting attainment.

Response AQ-7 – Because the BAAQMD does not have jurisdiction over land use decisions, no special coordination with the BAAQMD is necessary for new development to be incorporated in the Clean Air Plan.[3] BAAQMD approval would only be required for stationary sources that may require permits through the BAAQMD's rules and regulations. As discussed in Section 4.3.4 of the Final EIS, each Clean Air Plan update relies on the most recent growth forecasts developed by the Association of Bay Area Governments (ABAG), which are updated every two years. The ABAG projections take into account approved development plans, which include those anticipated under the 1994 GMPA and the Letterman Digital Arts Center project. Future Clean Air Plan updates will use the most recent ABAG projections, which would take into account the population of the Presidio under the Final Plan.

In response to EPA's comment, in order to facilitate coordination with ABAG, the Trust will provide ABAG with a copy of the Final EIS and a separate cover letter instructing the agency to note and use the Final Plan's housing and employment estimates to ensure that emissions attributable to growth at the Presidio will be incorporated within future Clean Air Plan

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[3] Personal Communication, Henry Hilken, BAAQMD. March 2002.

updates. Additionally, at the specific recommendation of ABAG,[4] the Trust will ask to participate in the draft review process that occurs for each biennial update of the projections.

AQ-8. ***Applicability of the Federal General Conformity Rule***

The EPA recommends that the Final EIS include estimates of direct and indirect emissions of ROG, NOx, and CO associated with the alternatives in tons per year for evaluating the applicability of the federal General Conformity Rule (40 CFR 51.853). The agency notes that if the 100 tons per year significance threshold is exceeded, then a conformity determination is required and should be included in the Final EIS.

Response AQ-8 – As discussed in Section 5.2 of the Final EIS, quantification of emissions is not necessary for determining applicability of the General Conformity Rule. This discussion showed that no conformity determination would be necessary for the Final Plan. The only types of direct and indirect emissions that must be included in the comparison with the 100-ton-per-year significance threshold are those that are reasonably foreseeable and that the Trust can practicably control through a continuing program responsibility (40 CFR 51.852).

The EPA points out that the daily emissions from motor vehicles shown in the EIS (Table 37) are reasonably foreseeable as an indirect consequence of the PTMP. Motor vehicle emissions, however, cannot be included against the applicability threshold because they would be affected by factors beyond the control of the Trust. The emission estimates rely on trip length and type characteristics and vehicle fleet characteristics. Regional accessibility, ultimate trip origins or destinations, and other factors govern trip characteristics, and consumer and economic trends influence vehicle fleet characteristics. Because the Trust cannot control the factors that affect these emissions, these factors cannot be used to determine applicability of the General Conformity Rule.

[4] Personal Communication, Paul Fassinger, ABAG Research Director. March 2002.

Construction activities would cause emissions that would be within the control of the Trust; however, these emissions would vary greatly depending on the specific activity taking place, the timing, the types of equipment being operated, and other factors. The lack of a known construction schedule means that an accurate estimate of foreseeable annual construction emissions cannot be provided. In response to the request for quantification of emissions, rudimentary estimates were generated using the California Air Resources Board URBEMIS7G model with an assumption of high-intensity construction activity. These estimates indicate that emissions exceeding 100 tons per year of NOx could be generated if more than 400,000 square feet of new construction are built in any given 12-month period (for construction equipment in 2000; equipment in subsequent years would have lower NOx emission rates because of ongoing regulatory programs to control emissions). Emissions of ROG and CO would be less than NOx and would not have the potential to exceed the applicability threshold. Because build-out of each of the contemplated alternatives would be phased over the life of the PTMP, such high-intensity construction (more than 400,000 square feet of new construction in any one year) is unlikely at the Presidio. Therefore, annual emissions from construction and demolition activities are not expected to exceed 100 tons for ROG, NOx, or CO. As a result of the new emission estimates for construction provided in this response, revisions have been made to Section 5.2 of the Final EIS, under "Clean Air Act."

AQ-9. ***Air Quality Conditions and Monitoring and California State Visibility Standard***

The NPS Pacific Great Basin Support Office suggests that the Final EIS include the air quality monitoring site at Point Reyes National Seashore upwind from the Presidio. The office also requests that the EIS include a discussion of the California state visibility standard.

Response AQ-9 – In response to this comment, the Affected Environment text of the EIS has been revised to include historical ozone and particulate matter information from the NPS Air Resources Division and the Interagency Monitoring of Protected Visual Environments (IMPROVE) program. In addition, the Affected Environment text has been revised to mention the state-

level standard for visibility (which is optical, not health-based) and to identify the lack of optical data for Point Reyes.

AQ-10. ***Doyle Drive Noise-Sensitive Areas***

The NPS Pacific Great Basin Support Office and the SFCTA recommend that additional noise-sensitive areas (including those identified for the Doyle Drive Reconstruction Project) be identified in the EIS.

Response AQ-10 – In response to the comment, Figure 25 in the Final EIS has been updated to identify Crissy Marsh (Area A), Lobos Creek (Area A), the Fort Scott parade ground, and residences along Armistead Road and Storey Avenue as noise sensitive areas. As the PTMP is a programmatic plan, the purpose of the figure is to highlight key areas within the Presidio for which the Trust would manage noise to minimize impacts on park resources, values and visitor experience. The Trust will refer to the list of Doyle Drive Sensitive Areas during future planning efforts within areas under the Trust jurisdiction that may be impacted by the Doyle Drive Reconstruction Project.

AQ-11. ***Precursor Pollutants***

The NPS Pacific Great Basin Support Office requests that the Trust mitigate the precursor pollutants of NOx and ROG to reduce further impacts on the area.

Response AQ-11 – As described in Section 4.3.4 of the EIS, no special mitigation would be necessary to reduce emissions of NOx and ROG from construction equipment. The Trust has identified mitigation strategies for NOx and ROG from motor vehicles in the form of the Transportation Demand Management program (Mitigation Measure NR-21). These measures are consistent with the strategies of the air quality plans in place to reduce regional ozone.

AQ-12. ***Cumulative Impacts***

The CCSF Planning Department, a neighborhood organization, and others comment that the analysis for both air quality and noise left out the details of the Draft Plan's contribution to cumulative impacts. The EPA specifically recommends that if the Final Plan contributes to a degradation in the level of service for traffic at nearby highways outside of the project area, then the Final EIS should discuss the cumulative impacts on CO concentrations in those locations.

Response AQ-12 – The Final Plan would contribute to cumulative growth in emissions, as described in Section 4.8.2. Cumulative effects of PTMP traffic on air quality and noise are quantified in Sections 4.3.4 and 4.3.5 of the Draft EIS, respectively. As discussed in Section 4.8.4, the analyses of transportation and circulation include the combined effects of the alternatives along with projected growth in traffic in the area. Because the air quality and noise analyses use these traffic data, cumulative analyses of future year 2020 conditions have been provided in the Environmental Consequences sections of the EIS.

The Draft EIS addressed cumulative impacts on CO concentrations at eight locations where Plan development would cause a substantial cumulative degradation in level of service. The intersections studied in the analysis of CO concentrations were selected based on the potential for each of the alternatives to cause a substantial deterioration in traffic conditions (levels of service). The selection process considered locations within and around the Presidio. Nearby highway locations, including the Golden Gate Bridge toll plaza, experience occasionally unacceptable levels of service due to regional traffic. In response to the EPA comment, the air quality analysis in the Final EIS has been updated to analyze CO concentrations at a ninth intersection (Park Presidio Boulevard/Lake Street) that connects with the highway system. The updated CO analysis, shown in Table 36 of the Final EIS, shows that none of the alternatives substantially change total CO concentrations at the locations (e.g., Park Presidio Boulevard/Lake Street) where regional or other city traffic dominates. Therefore, the change in cumulative CO concentrations at highway locations and the Golden Gate Bridge toll plaza caused by PTMP-related development is expected to be minimal.

AQ-13. ***Miscellaneous Specific Comments and Minor Text Corrections***

A number of specific comments are treated individually below.

- Update Figure 25 to show additional noise-sensitive areas.

Response AQ-13 – Comment noted. Figure 25 has been updated to show additional sensitive locations in Area B. Crissy Marsh and Lobos Creek are sensitive areas within Area A.

- Pile-driving noise and mitigation should be included.

Response – Section 4.3.5 of the Draft EIS, as well as the GMPA EIS, acknowledge that use of pile drivers could occur for certain projects. Noise from pile-driving would be at the upper end of the anticipated range of construction noise levels (approximately 100 dBA at 50 feet), and appropriate mitigation measures are included.

- Use of FHWA NAC or the 3 dBA criteria is unclear.

Response – For an explanation of the Federal Highway Administration (FHWA) Noise Abatement Criteria (NAC), please refer to Section 3.3.5 (under Noise Control Regulations and Programs). As described in this section, the FHWA NAC were developed as tool to protect noise-sensitive land uses from highway noise. The NAC were used in the PTMP impact analysis to characterize traffic-related noise effects (please refer to Section 4.3.5 for additional discussion). A description of the NAC is also provided in Table 7 (Section 3.3.5) of the EIS. The "3 dBA criteria" is commonly used in environmental analyses to characterize the change in the ambient noise environment which is considered noticeable by most people. As explained in Section 4.3.5 (Methodology) of the EIS, 3 dBA is used in the PTMP noise analysis to define what constitutes a noticeable noise increase.

- There are no quantitative values of traffic noise at the sensitive receptors, including Riley Avenue housing. Predictive values should be included.

Response – As discussed in Section 4.3.5 of the EIS, noise conditions at Riley Avenue housing would approach or exceed the FHWA NAC, which is 67 dba (1 hour L_{eg}) measured on the building exterior, in some EIS alternatives. The noise environment is largely influenced by traffic on Doyle Drive, and interior noise levels would be less. Quantitative results of noise modeling are provided for multiple locations in the Final EIS. See Table 38.

4.17 NEW CONSTRUCTION (NC)

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NC-1. *Acceptability of New Construction*

NC-2. *Replacement vs. Rehabilitation Construction*

NC-3. *Demolition of the Non-Historic Building Square Footage*

NC-4. *New Construction After Exhaustion of Rehabilitation/Conversion Options*

NC-5. *New Construction Only If Related to Park Themes*

NC-6. *New Construction Only If Replacement of Similar Size*

NC-7. *Location of New Construction*

NC-8. *Area A Building Space and Building Space Changes Since Adoption of the GMPA*

NC-9. *Parking Garages*

NC-10. *Overall Square Footage Reduction*

NC-11. *Doyle Drive*

NC-12. *Sustainable Buildings*

NC-1. *Acceptability of New Construction*

Comments regarding new construction in the Presidio range from general support for new development to conditional support for some types of construction or construction in particular areas to complete opposition to any new construction. Several commentors state that they do not want any new construction within the Presidio for various reasons. Some commentors, such as the NRDC, feel that it is not appropriate to have construction in a national park and that a park should also not become a site of major demolition. The Pacific Heights Residents Association states, "No new construction is appropriate in a national park nor is it warranted." A Presidio advocacy group asks that the Trust cite any mandates for new construction in federal law related to the Presidio, and others ask the Trust to cite the federal authority, other than the self-sufficiency mandates of the Presidio Trust Act, justifying new construction in the Presidio. Several commentors state that new construction would not be justified since there are enough available buildings to achieve financial self-sufficiency without constructing new buildings. They assert that reusing the existing buildings will keep the Presidio a park and not a business compound. Several commentors urge the Trust to minimize park development, even if that means reducing some of the current services and programs, and to minimize private development and other private for-profit uses. Commentors argue that new construction is not needed because it will generate less income for the Trust and is a riskier business proposition than renting out existing buildings, and that the expense and low financial yield of new construction would not offset its undesirable effects.

Several other commentors believe that new construction is acceptable, so long as it does not occur in designated historic areas such as Fort Scott, the Main Post, or the Public Health Service Hospital or in areas that contain natural resources such as Crissy Field and Tennessee Hollow. Other commentors request that the type of construction be limited to a specific type of development or that construction be limited to the reconfiguration or renovation of existing housing units and facilities. Still others feel that development should be limited to areas that are already developed. One commentor asks that the Trust consider additional new construction in the Presidio in appropriate areas, suggesting that it would generate revenues that are necessary to maintain and sustain the park.

Response NC-1 – The Final Plan does not specifically propose new construction, but also does not preclude it. Instead, the Plan establishes quantitative, qualitative, and procedural constraints to ensure that any new construction proposed in the future is undertaken in a manner that is consistent with the National Historic Landmark District and protective of the resources and qualities that make the Presidio a special place. New construction would be undertaken only where necessary to meet Plan goals, including preservation, protection, and enhancement of natural, cultural, and recreational resources, making the park accessible to a wide cross-section of the public, and meeting the financial self-sufficiency requirement.

Limited new construction is an accepted feature of many national parks, which often provide lodging and visitor services. Moreover, the give and take of building space (demolition and new construction) has played a role in shaping and re-shaping the Presidio from 1776 to the present day. New construction proposed at the Presidio in the future will fall into one of two categories: residential construction required to replace dwelling units removed to expand open space, and non-residential construction required to meet other Plan goals such as historic preservation. The amount of residential construction will depend on a variety of factors, and is estimated at between 200,000 and 400,000 square feet (between 200 and 400 apartments). The issue of replacement housing is discussed further in the Housing responses.

The amount of non-residential construction is unknown, but will not exceed a maximum of about 310,000 square feet. New construction may take the form of building additions, annex structures that facilitate the reuse of adjacent buildings or groups of buildings, or freestanding structures. Examples of possible new non-residential construction include the following:

- An addition at the back of historic Pershing Hall (Building 42) to make rehabilitation and reuse as lodging or apartments feasible;
- An annex to historic Stilwell Hall (Building 650) in place of the non-historic buildings to the east along Mason Street, if needed to facilitate rehabilitation and reuse as lodging; and
- A new recreation facility if the non-historic YMCA gym (Building 63) is removed for restoration of the Tennessee Hollow stream corridor.

An example of a potential annex to historic Stilwell Hall is illustrated in Chapter Three of the Final Plan. An example of possible new residential construction is also illustrated in Chapter Three, and would involve construction on the site of a non-historic building west of the Thoreau Center (Building 1028). If proposed and implemented, such a project would replace housing removed in the southern part of the park, improve the aesthetic and historic context of the Thoreau Center area, and provide a stable source of revenue for other park improvements.

There are no federal statutes that require, promote, or preclude new construction within the Presidio. The Presidio Trust Act requires that the Trust achieve, at a minimum, financial self-sufficiency by 2013. See Section 105(b) of the Trust Act in Appendix A of the PTMP. The Trust Act further requires development of a "management program" designed to "reduce expenditures... and increase revenues to the Federal Government to the maximum extent possible." The management program is to consist of demolition of structures that cannot be cost-effectively rehabilitated, and new construction limited to replacement of existing structures of similar size in existing areas of development. See Section 104(c) of the Trust Act in Appendix A of the PTMP. The Final Plan is consistent with this statute and calls for an overall decrease in building square footage, and for replacement construction only within already developed areas of the park. Replacement construction would also have to comply with planning guidelines contained in Chapter Three of the Plan, and procedures outlined in Chapter Four. These guidelines and procedures would ensure that any new construction is located and sized appropriately, and that further analysis and public input is undertaken in a manner consistent with NEPA and NHPA.

Because the actual level of demolition and new construction will not be known until more specific plans or projects are proposed, the EIS analysis conservatively assumes that the maximum allowable square footage of new construction would occur under each alternative. This assumption is conservative because it means that resulting impacts are projected to be larger than they would be in the likely instance that less new construction occurs. EIS alternatives include a range of possible quantities of new construction, from none (Minimum Management Alternative and Final Plan Variant), up to 1.37 million square feet (Cultural Destination Alternative). The Final Plan Alternative, at 710,000 square feet, represents the middle of this range.

Commentors who fear that new construction cannot be accomplished without impairing the NHLD may take comfort from the constraints included within Chapters Three and Four of the Plan, and from existing local examples of compatible new construction. These examples include the compatible addition to the Presidio Fire Station (Building 218), and the new Presidio Golf Course Clubhouse, both of which are within the NHLD. Another local

example is the new San Francisco Main Library, which lies within or immediately adjacent to the San Francisco Civic Center NHLD.

Contrary to what some commentors suggest, new construction offers fewer financial risks than reuse of existing buildings, and can provide a reliable revenue stream to help finance historic preservation of adjacent/nearby buildings or activities. In all likelihood, new construction would be undertaken by third parties, and not directly by the Trust, similar to the ground lease arrangement being used for the LDAC project. With this arrangement, the costs of improvements are not borne by Trust, nor does the Trust assume risks associated with cost overruns, vacancies, or declining rents. New construction can also help to obviate financial risks associated with historic rehabilitation, since a building addition or annex can help provide revenues to support the historic rehabilitation.

The financial yield from ground leases and new construction is generally less than if the Trust retained ownership over improvements, and thus generally results in less rent if one were to replace one square foot of existing, rehabilitated space, with one square foot of new space. A more appropriate comparison to make, however, is between unimproved space and new space. The costs associated with rehabilitating unimproved space are often difficult to predict with certainty, and both the costs and the associated risks can offset potential revenues to the extent that the revenues become comparable to those from new space. In the example cited above, 58 dormitory units in Building 1028 could be replaced by 100 or 150 small apartments units that could be rented at much higher rents than the units they replace. The new units could generate rents comparable to those from existing larger units, and in some cases could be more cost-effective to construct than units created within existing buildings through conversion of non-residential space to residential use.

NC-2. ***Replacement vs. Rehabilitation Construction***

A Presidio advocacy group asks the Trust to describe the difference between replacement construction and construction related to rehabilitation/renovation of existing buildings. They seek clarification of whether construction related to rehabilitation/renovation of existing buildings is included in maximum replacement construction estimates, and whether the expansion of the existing building space is considered part of the "building cap."

Response NC-2 – New construction includes any additional square footage that is added outside of the existing building envelope, whether as an addition to an existing building, within an annex, or as a freestanding structure. In response to comments, these various types of new construction have been clarified in PTMP, and examples are provided. Until new construction is actually proposed, however, it is impossible to predict how much of one type versus another will be built. As described above, the total amount of new construction allowed is constrained by quantitative limits within each planning district and Presidio-wide, and the actual proposals will be subject to additional analysis and public review as required under NEPA and NHPA.

NC-3. ***Demolition of the Non-Historic Building Square Footage***

With regard to demolition, the Sierra Club states that the Trust should demolish the two million square feet of non-historic buildings as called for in the GMPA to make the park more peaceful and less congested.

Response NC-3 – The PTMP anticipates substantial demolition where it would further the goals of the Plan. For example, Wherry Housing is planned for demolition in phases over the next 30 years in order to allow for expanded open space and habitat restoration. Buildings in the West Washington, East Washington, and Tennessee Hollow areas are also planned for demolition over time to facilitate natural resources goals. In other areas, buildings are not identified specifically for demolition, but planning guidelines suggest that view corridors may be enhanced (for example, between the Main Post and Crissy Field (Area B)), which implies the removal of non-historic buildings when feasible.

In areas where demolition is planned, the park would be "more peaceful and less congested." Overall, the Plan provides for almost 100 acres of additional open space. Plan goals do not only involve open space, however, and the Presidio is expected to be a vital community where residents, employees, and visitors benefit from a host of public uses, and where buildings and districts are preserved through active reuse. In traditionally more dense and active areas like the Main Post, Fort Scott, Letterman, and Crissy Field (Area B), the

Plan contends that the Presidio cannot remain a sleepy collection of mostly vacant buildings if the Trust is to succeed in its mandates to achieve financial self-sufficiency and to provide for the long-term vitality of the park. Historic buildings must be rehabilitated and reused to the extent feasible. Also, non-historic buildings may present opportunities to generate both the revenues to fund park improvements and operations, and the activities that will make the park accessible to the public.

For example, the Plan identifies the Commissary site as the preferred location for a museum, acknowledging the prominent and accessible nature of the site. The Commissary building itself is in fairly good condition, and a financial and architectural analysis may determine that it should be retained rather than removed or replaced, and that this would represent a sustainable way to accomplish Plan objectives. The GMPA called for "interim" military use of this site, and also identified the site for visitor and education land uses and long-term restoration to "natural landscape." Other non-historic buildings along Crissy Field (Area B), including the prominent "Glass Palace" (Building 924), were proposed for removal to expand open space and provide small parking areas on the south side of Mason Street. See 1994 GMPA illustrations, pages 91-93. Given the intense use of recreational areas at Crissy Field, and convergence of people and vehicles at parking areas, it could be argued that this proposal might not be as "peaceful" and uncongested as the commentor suggests.

The EIS analyzes an array of alternatives, including a range of possible amounts of demolition, thereby facilitating consideration of a variety of possible outcomes.

NC-4. ***New Construction After Exhaustion of Rehabilitation/Conversion Options***

Many commentors, including the GGNRA Citizens' Advisory Commission, feel that the Trust should allow new construction only after all possibilities for conversion and rehabilitation have been exhausted. Similarly, other commentors, such as the CCSF Planning Department, maintain that the Trust's focus should be on reconfiguring existing buildings rather than on infill development. The NRDC asks, " If housing is such a high priority, why has the Trust not allocated more space in existing buildings to residential use and less space to other uses, such as lodging/conference and office, rather than proposing construction of new housing?"

Response NC-4 – Chapter One of the Final Plan states that the Trust will give "highest priority" to actions that carry out the preservation, rehabilitation, and use of historic buildings and landscapes, and also articulates the Trust's policy to allow new construction only where it is in keeping with the character and integrity of the NHLD. The Plan does not preclude the possibility of new construction prior to reuse of all historic buildings, in part because new construction is envisioned as a way to facilitate rehabilitation and reuse by improving the functionality of older buildings and increasing the financial feasibility of reuse.

The Final Plan also recognizes that some new construction may be necessary to replace housing units removed to allow expansion of open space, particularly since other housing units may be removed by preserving historic residential buildings for non-residential uses. In other words, it is unlikely that all units planned for demolition at Wherry Housing (463), East and West Washington (36), and Tennessee Hollow (66) could be replaced entirely through conversion and subdivision of existing buildings without incurring substantial expense and/or compromising the historic character of residential buildings. Therefore, the Plan anticipates the need for some replacement housing within compatible new construction. The use of existing buildings and new construction for replacement of housing units is discussed further in the Housing responses.

New construction can also provide an opportunity to improve the aesthetic and historic context of the Presidio, and thus may appropriately be pursued in advance of reuse of all historic buildings. For example, as described in responses above, Building 1028, a concrete block dormitory located next to the Thoreau Center, may be replaced with more compatible new construction if feasible. This type of proposal would require more analysis and public input as described in Chapter Four of the Final Plan.

NC-5. ***New Construction Only If Related to Park Themes***

Several commentors state that the Trust should permit new construction only for projects for which there is a demonstrated need related to park themes.

The GGNRA Citizens' Advisory Commission also states, "No final decision about the capacity of any area to absorb significant new density should be made until detailed studies, including use, massing and types of construction are conducted. That could be part of the specific district plans. Only that which is needed programmatically should be built."

Response NC-5 – Any new construction will be undertaken in support of goals articulated in the Final Plan, such as preserving and enhancing park resources, housing Presidio-based employees, making the park accessible to a wide cross-section of the public, and generating revenues to support park operations. Though the Plan does not provide the specific locations, size, or design of new construction, it does set forth the general parameters within which these characteristics will be determined over time. For example, new construction will be limited to areas that are already disturbed or developed, and must be consistent with the planning guidelines in Chapter Three, which will ensure that the size, scale, location, and design of new construction are compatible with its historic setting and the character of the area. Quantitative limits on the amount of total square footage within each planning district, as well as limits on the maximum amount of demolition and new construction within each district, would ensure that "significant new density" does not occur in areas where it would compromise the NHLD or adversely affect the visitor experience. Thus, the "capacity" of each district would be respected. The design standards, coupled with quantitative thresholds, obviate the need for further studies at a Presidio-wide or district-wide basis. Further studies and more specific design proposals are nonetheless required before new construction is undertaken, and would be reviewed pursuant to NEPA and NHPA, as described in Chapter Four of the Final Plan. The Programmatic Agreement among the Trust, NPS, ACHP, and SHPO (included as Appendix D to the Final Plan EIS) also describes a consultation process, pursuant to NHPA, that will provide for review of more specific plans and proposals for new construction in the future.

NC-6. ***New Construction Only If Replacement of Similar Size***

Several commentors suggest that the Trust should keep new construction to an absolute minimum and limit it to replacement of existing structures with an improvement of similar size. For example, the CCSF Planning Department states, " Except for expansion of facilities at Letterman and the Western Medical Institute of Research, new construction should be limited to replacement of existing structures with an improvement of similar size." Similarly, the Cow Hollow Association states, "In general new construction should be kept to an absolute minimum and reuse of existing structures made a first priority." The Cow Hollow Association also indicates that the phased demolition of Wherry Housing could allow for some new construction.

Response NC-6 – The Final Plan anticipates that some new construction will be necessary to further the key goals of the Plan, although the precise amount is unknown. Given this uncertainty, the Plan places quantitative, qualitative, and procedural constraints upon how and where new construction may occur. These constraints ensure that the overall amount of building space at the Presidio will be reduced, and that new construction will only be permitted in areas that are already developed. They also ensure that new construction will be compatible with the historic character of the Presidio, and will be of a scale and design that will not compromise the integrity of the NHLD.

The Presidio Trust Act (included as Appendix A to the Final Plan) requires that the Trust's management program include new construction "limited to replacement of existing structures of similar size in existing areas of development." This is true for every area of the park, including the 23-acre Letterman Digital Arts Center. Non-historic buildings in this area were substantially out of scale with surrounding buildings, and surrounded by acres of surface parking. These will be replaced with smaller-scale structures and underground parking.

NC-7. ***Location of New Construction***

Many commentors request that the EIS specifically identify and describe the areas where new construction would occur. Commentors also suggest that the EIS accurately disclose the allowable amount of demolition and construction proposed by the Plan. Some commentors, including the National Trust for Historic Preservation, express concern about impacts on historic buildings by stating that the Presidio Trust should attempt to reduce the development footprint and give priority to sites occupied by non-historic buildings if new construction is required.

The San Francisco Bay Conservation and Development Commission (BCDC) states, "As land use intensities increase and a more diverse mix of land uses are introduced to the Presidio, there is a greater chance that recreation and habitat areas will be negatively impacted by additional traffic, noise, light and overuse. These impacts might be harder to avoid with additional square footage being added to Crissy Field and Fort Scott, particularly if these increases reduce the amount of land available for buffers, recreational areas, additional open spaces, and viable wildlife linkages." The BCDC further states that the Trust should not increase density where development exists and should try to reduce the development footprint of non-historic buildings to increase land for open space, recreation, buffers, and wildlife corridors and to improve the visual character. The GGNRA Citizens' Advisory Commission states that "no final decision about the capacity of any area to absorb significant new density should be made until detailed studies, including use, massing, and types of construction are conducted."

Telegraph Hill Dwellers maintain that "no new buildings should be built, with the exception of replacing those [buildings] that are truly undistinguished, such as the Wherry Housing units, and are relatively out of sight." Telegraph Hill Dwellers then go on to state that just one building in the wrong place, such as the Main Post, will spoil the distinctive "look and feel" of the Presidio. One commentor writes, "The public needs to understand how the totals for overall building square footage can be generated without seeing a specific plan for each planning district." The Fort Point and Presidio Historic Association states, "We are particularly concerned over the draft plan's premature commitment to expanding open space and limiting new construction to the most historically sensitive areas of the Presidio. This policy is not mandated by the Presidio Trust Act and conflicts with preservation laws. The draft plan should be modified to state that locations where open space is created by demolition of non-historic structures would be available for possible new construction." A Presidio advocacy group asks, "What will be the maximum amount of replacement construction, demolition, and renovation that could occur in both Area A an Area B?"

Response NC-7 – The PTMP is a programmatic plan, and as such, does not identify specific locations for new construction. However, the Plan does indicate the amount of new construction that would be permitted, along with the amount of demolition that would be permitted and the total square footage desired for each planning district and for the Presidio as a whole. These maximum amounts of construction/demolition and desired square footage could be said to establish a "development footprint" but, since no development is actually proposed at this time, should more accurately be considered as a set of parameters comparable to a city's general plan or zoning ordinance.

In addition, the Plan requires that new construction only occur in areas that are already developed, and that it comply with both the planning guidelines in Chapter Three, and the processes and procedures outlined in Chapter Four. (The Programmatic Agreement included as Appendix D of the EIS also provides procedures required for compliance with NHPA.) These constraints are intended to ensure that new construction is compatible with historic buildings, and together with the principles regarding preservation articulated in Chapter One, will mean that sites occupied by non-historic buildings are considered for new construction. Possible examples are cited elsewhere in these responses, and include the site of non-historic buildings adjacent to Stilwell Hall at Crissy Field (Area B), adjacent to the Thoreau Center, and in the residential enclave behind the Pilots Row houses at Fort Scott.

The amount of land available for open spaces, recreation, buffers, and wildlife corridors will not decrease under the PTMP. To the contrary, the PTMP contains extensive provisions to improve the amount and quality of these features and to improve the visual character of the Presidio by removing buildings, reestablishing native habitat, enhancing natural drainages, and improving recreational facilities. The Plan will also result in a decrease in overall square footage, and thus "land use intensities" will decline.

In some areas, the Plan will allow increases in building square footage to partially replace square footage that is proposed for elimination elsewhere. In these instances, and where vacant buildings are proposed for reuse, the EIS evaluates the extent to which the increase in activity could affect historic and natural resources at the Presidio due to traffic, noise, light, and other potential byproducts of active use. Mitigation measures are provided to protect important resources and reduce impacts where necessary.

The suggestion that the Trust should not increase densities in developed areas and should reduce the footprints of non-historic buildings would be difficult to accomplish while achieving the other key goals of the PTMP. If development is to occur only in areas that are already developed, then either densities in these areas must be increased or development must be allowed within the existing buildings' footprints. If only demolition were allowed, Plan goals such as rehabilitating and reusing historic buildings, housing Presidio-based employees, financing park operations and improvements, and more, would be in jeopardy. For example, demolition of Wherry Housing over time will eliminate revenue-generating units and replace them with native habitat. This process will not only require substantial funding for demolition and habitat restoration, but will also result in a loss of residential revenue. Thus, it is anticipated that this project will only be feasible once revenue generation is increased elsewhere. This additional revenue generation will necessarily result in an increase in activity, either within existing buildings, in new buildings, or in some combination.

It should be noted that arguments favoring less activity in the park than exists today are antithetical to the preservation of the Presidio's historic buildings, which require active reuse, and are also inconsistent with the historic character of the Presidio, which was always an active community with a wide variety of land uses. Arguments that call for less activity necessarily suggest fewer visitors as well, in direct opposition to the goals expressed in Chapter One of the Plan regarding bringing people to the park.

In response to commentors' suggestions, the amount of new construction and the overall square footage permitted in the Crissy Field (Area B) planning district have been reduced since the Draft Plan. Also, Chapter Three of the Final Plan contains guidelines to ensure that any new buildings constructed at the Main Post are located in such a way that they enhance rather than detract from the formal organizational structure of the central open spaces.

NC-8. *Area A Building Space and Building Space Changes Since Adoption of the GMPA*

A Presidio advocacy group inquires about the square footage caps and asks the Trust to provide the maximum amount of replacement construction, demolition, and renovation that could occur in both Areas A and B. The group asks for clarification of whether the demolished building space in Area A will be banked and rebuilt in Area B, and also requests information regarding demolition and construction that has occurred since the 1994 GMPA was adopted. The amount of construction is requested for both Areas A and B, and for both replacement construction and construction associated with rehabilitation/renovation of existing buildings. The same group also seeks clarification with regard to building square footage, and asks the Trust to identify the square footage of each existing building in both Areas A and B and provide a list of and detail on those buildings, including the date of construction and historical designation. One individual states that the Trust should clearly define and firmly acknowledge a construction limit or cap for the Presidio in both Areas A and B. An individual asks whether the Trust plans to build "2.199 million square feet of new replacement construction in Area B (Lucas 1.489 million square feet with underground parking garage and Trust Plan 710,000)."

Response NC-8 – The PTMP is a programmatic plan that addresses the square footage of the Presidio as a whole and within each district. In response to comments, the Final Plan has been revised to remove caveats contained in the Draft Plan and clearly articulate the goal of reducing building space within Area B of the Presidio to 5.6 million square feet. Similarly, clear square footage limits are expressed for each planning district.

The PTMP applies only to Area B of the Presidio, which is the area under the jurisdiction of the Trust. The amount of demolition or new construction in Area A is not addressed, and an occurrence in one area will not affect what will be allowed in another. In other words, only space demolished and constructed in Area B will count toward the calculation of total square footage and the goal of reducing building space in Area B.

As described on page 140 of the Draft Plan, 6.3 million square feet of space existed in Area A plus Area B when the GMPA was adopted in 1994. Between 1994 and the passage of the Presidio Trust Act, the NPS demolished approximately 120,000 square feet of space, mostly at Wherry Housing in Area B, and demolished some buildings in Area A outside the Trust's jurisdiction. Today, there are about 5.98 million square feet of building space in Area B, including several examples of new construction undertaken by the

NPS, such as the Presidio Fire Station addition and the new Presidio Golf Course Clubhouse.

The Plan does not describe building uses or treatments on a building-by-building basis. However, a list of all historic buildings in Area B (including date of construction and building number) is provided in Appendix C of the Final EIS, and a list of all existing buildings and their current square footage is available from the Trust's Planning or Real Estate Departments upon request. This information is maintained in a database that is updated periodically to include demolitions and new space, and will allow the Trust to monitor progress toward the goal of reducing the Presidio's square footage to 5.6 million square feet. Similar information for Area A may be obtained from the NPS.

NC-9. ***Parking Garages***

Several commentors ask for clarification regarding parking garages, including whether the Trust has any plans for underground garages or garage structures, and whether the square footage of such garages is included in the building cap. A Presidio advocacy group asks the Trust to "include the LDA Letterman project underground parking garage in the total square footage under PTIP."

Response NC-9 – For purposes of calculating the amount of built space within the Presidio, above-ground parking is included in the calculation, but underground parking is not. Parking associated with the LDAC project will be below-grade and will therefore not be counted as building square footage.

The Final Plan does not propose any additional underground parking, but does not preclude its construction in the future, following additional site-specific planning, environmental review, and associated public input. Any such parking would be required to comply with goals articulated in Chapter Two of the Final Plan regarding parking management and the overall reduction in parking spaces in each planning district over time.

NC-10. ***Overall Square Footage Reduction***

Some commentors inquire about the overall square footage reduction, asking the Trust to substantiate the claim that it is reducing the built space at "build out." One commentor specifically asks the Trust whether the reduction in total square footage is merely a goal or if it is a commitment. The commentor questions how 5.96 million square feet could be exceeded for a "limited and reasonable time," without defining the words limited or reasonable. Another commentor asks, "The San Francisco General Plan calls for less total area of development in gross square feet in the Presidio. The Presidio Trust plan calls for substantially more development than currently exists. Why?"

Response NC-10 – The PTMP has been revised to clarify that the Trust's goal is to reduce the amount of building space in the Presidio from 5.96 million square feet to 5.6 million square feet or less over time. The Trust does not propose "substantially more development than currently exists." The goal of reducing building space will be pursued in concert with other goals of the PTMP, such as expanding open space, preserving and enhancing cultural and natural resources, making the park accessible to a wide cross-section of the public, housing Presidio-based employees, and ensuring long-term financial sustainability. See Plan Summary in Overview section of Final Plan. All of these major provisions of the Plan should be viewed as commitments, in that they are the overarching policies that will inform individual implementation decisions by the Trust over time. Just as the San Francisco General Plan contains policies and objectives related to "transit first" that guide investments and decisions about the City's transportation systems, the planning principles articulated in the Trust's Plan will guide investments and decisions about reuse, removal, and replacement of buildings within the Presidio. See Response LU-3 regarding the relationship between the San Francisco General Plan and the PTMP.

Text and figures in Chapter Four of the Final Plan contain more information regarding strategies that will be used to implement the Plan, including the goal of reducing the amount of building space over time.

NC-11. ***Doyle Drive***

One commentor seeks clarification of whether buildings removed as a result of the Doyle Drive project would be rebuilt elsewhere within Area B. The commentor asks whether the square footage of any buildings demolished for the Doyle Drive project would be reconstructed elsewhere at the Presidio. The commentor also asks whether the replacement square footage allowed for

these demolished buildings would be in excess of the Plan's stated levels of demolition and replacement construction.

Response NC-11 – As described in Chapter Two of the Plan, replacement of Doyle Drive is a project of the San Francisco County Transportation Authority, the California Department of Transportation (Caltrans), and the Federal Highway Administration. The Trust is cooperating with these agencies and is participating in the ongoing planning efforts because of the project's potential impacts on the park and its inevitable use of land under Trust jurisdiction. Though the Draft EIS for the project has not yet been circulated for public or agency review, the Trust understands that some alternatives being analyzed call for demolition of buildings within Area B. It is not clear whether the amount of space that would be demolished would fall within the level of demolition articulated in the PTMP for the affected planning districts, nor is it certain that the agencies involved would view those levels as limiting or binding.

If the alternative for the replacement of Doyle Drive that is selected and funded requires demolition of buildings in Area B of the Presidio beyond the levels contained in the Plan, amendment of the Plan would be required. Square footage represented by buildings that are demolished for any reason, including construction of Doyle Drive, could be replaced elsewhere if needed to satisfy Plan goals, as long as the replacement is consistent with the limits on new construction and overall square footage established in the Plan. Replacement construction would be subject to the planning guidelines articulated in Chapter Three of the Plan, and would require additional analysis and public input as described in Chapter Four.

NC-12. ***Sustainable Buildings***

An individual suggests that the Trust require all new structures and remodeled structures to be built in a sustainable fashion that follows the Leadership in Energy and Environmental Design guidelines developed by the U.S. Green Building Council.

Response NC-12 – The Trust plans to continue its current practice of incorporating sustainable design features and technologies where appropriate in new and renovated building space. These provisions are discussed in Chapter Two of the Final Plan, although specific standards are not articulated.

4.18 HOUSING & EMPLOYMENT (HO)

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HO-1. *Jobs-Housing Balance and No Net Loss of Housing*

The NPS asks the Trust to "reconsider its new policy of 'no net loss of housing.'" They express concern that the new construction "used to satisfy the stated jobs/housing balance" would threaten the status of the NHLD, and state that a jobs-housing balance should not be pursued at the expense of park resources. ("[W]e do not support the level of housing needed to achieve a jobs-housing balance at the expense of critical resources.") A number of commentors share this concern. Some question the concept of a jobs-housing balance, and others do not agree that establishing a jobs-housing balance is an appropriate goal for a national park ("We do not feel that a stated policy using an artificial ratio of 'jobs/housing balance' has any place in a national park.") ("The plan lacks an explanation of why… this is an appropriate policy for a national park.")

Some commentors suggest that the commitment to no net loss of housing was premature given the lack of detail about resulting replacement units. Others suggest it was premature because too many questions remain: is removal of existing units consistent with the Trust's self-sufficiency mandate, especially considering the cost of new construction? To what extent can existing non-residential buildings be converted to residential use? Is a preference for dividing large residential units into smaller units appropriate given the local shortage of housing for families? Can the introduction of new housing avoid adverse effects on historic and archaeological resources, including the NHLD?

Commentors state there is no legal requirement for employee housing or a jobs-housing balance in a national park, that at other national parks housing is being eliminated or relocated to outside park boundaries, and that the number of jobs could be reduced – reducing the demand for housing – if less non-residential space were leased. One commentor mentions, as an example, that housing is not allowed on lands held in trust by the State of California, and suggests that providing housing generates a sense of territoriality and privacy antithetical to the purpose of national parks. Another commentor asks if any other national park has a jobs-housing balance policy.

The GGNRA Citizens' Advisory Commission and other commentors question the numeric goal of 1,650 dwelling units, asking that the goal either be eliminated or considered a "cap." The Commission suggests that the housing goal be to meet the demand for Presidio-based full-time employees.

The CCSF Planning Department states "There are numerous General Plan policies that support preservation of the existing housing supply, and the City

supports the concept of no net loss of housing. However... Citywide System Policy 5 states that 'No additional housing units should be constructed in the Presidio.' Given the status of the Presidio as a National Park, the focus of the Trust's efforts should be on subdivision and reconfiguration of existing housing. Only when it is not possible to convert existing structures into smaller units should new housing be constructed."

Other commentors support the concept of no net loss of housing more emphatically, asking that the Trust make a jobs-housing balance a priority, retaining 1,650 units and ensuring no-net loss of housing. The Rails-to-Trails Conservancy states "One important element of sustainable, livable communities is that people live in places that are close to where they work and recreate. Providing adequate housing for expected employee base in the Presidio is essential to minimize the number of vehicle trips." Commentors, such as the Housing Rights Committee of San Francisco, point out that housing remains the most important issue facing San Franciscans, and while the Presidio cannot cure the housing problems of the City, it can ensure that an increase of jobs at the Presidio "doesn't add to our housing shortage." A few commentors advocate for an increase in housing over time "to strengthen the Presidio community and ensure its long-term success."

Response HO-1 – The Presidio is unlike any other national park. It is a former military installation. It is a National Historic Landmark District. It must be financially self-sufficient by 2013. And it sits within the densest urban area west of the Mississippi River. This unique combination of circumstances provides many compelling reasons to maintain housing in the park, despite the absence of any legal requirement to do so.

As described in Chapter Two of the Final Plan, housing has long been an important part of the Presidio, which has had a fluctuating residential population through war time and peace time, and included 4,700 residents just before base closure.[1] Thus, although housing may or may not be appropriate in the vast majority of our nation's national parks, here it would be remiss not to include housing in the park's future. Housing provides an important link with the Presidio's past, with approximately 300 dwelling units and 380 group quarters located within historic buildings, and continues the Presidio's long tradition of residential use. Housing can also help satisfy long-held objectives for the park, including providing housing to employees – thereby minimizing auto trips into and out of the park – improving the safety and security of the park at all times of the day and night, and providing revenues needed to support the operation and maintenance of the park. Residential use can also be a cost-effective way to preserve historic buildings, and can help fund capital improvements, including desired open space and landscape changes.

In response to comments on the Draft Plan, the Final Plan clarifies some of these reasons for maintaining housing within the Presidio, and also moderates the "no-net-loss" policy as suggested by the GGNRA Citizens' Advisory Commission and others. Equally important, the Final Plan addresses concerns related to the potential for new housing to impair park resources.

The Final Plan presents the number of overall residential accommodations as a range from about 1,400 to 1,654 units, relying on housing demand and other factors to determine the ultimate number, rather than establishing the 1,654 goal through "no net loss."

The Draft Plan's suggestion that the Presidio should maintain its existing housing stock, is a direct descendant of the "jobs-housing balance" policy first articulated for the park in the 1994 GMPA. The 1994 GMPA suggested that sufficient housing should be maintained to accommodate over 50 percent of new employee housing demand, even if additional housing were required to provide this "jobs-housing balance" (GMPA, page 51). If the standard of meeting 50 percent of new employee housing demand were applied to a more realistic projection of employment, the result would indicate the need for 1,508 dwelling units under the No Action Alternative (GMPA 2000), and 1,654 under the Draft Plan Alternative. Draft EIS, Table 39. Thus, setting aside for a moment the issue of how/where replacement units should be provided, the Draft Plan's "no net loss" of housing policy and the 1994 GMPA's "jobs-housing balance" could potentially result in virtually the same number of units (i.e., about 1,650) once employment reaches levels projected under the Plan.

[1] 1990 Census Data.

The PTMP rejects the implication in the 1994 GMPA and its EIS that a jobs-housing balance can be defined as accommodating 50 percent of new employee housing demand, and instead suggests that a balance consists of meeting 100 percent of adjusted demand – that is 100 percent of total new housing demand, adjusted to reflect the number of employees who are expected to actually desire housing at the Presidio. This methodology acknowledges that the location of employment is only one factor that people use when determining where they wish to live. Whether or not someone owns their home, where children go to school, where other members of the household work – all these factors contribute to locational decisions, along with the relative price of housing. Using this methodology, the Draft EIS projected an adjusted demand for 1,219 dwelling units plus some dormitory units. Minor adjustments to land use assumptions between the Draft and Final Plan brought this number to 1,172 plus dormitory units in the Final EIS. See the Response to HO-3 regarding housing demand, below.

Many commentors appear to question the no net loss of housing policy because they assume it will result in incompatible new construction, potentially threatening the status of the NHLD. This assumption is entirely unwarranted given: (1) that the significance of the District was established despite the presence of more than 800 non-historic units of varying degrees of compatibility; (2) that qualified design professionals have demonstrated in San Francisco and elsewhere the ability to successfully integrate new construction within historic districts; and (3) that the guidelines and processes established in the Plan ensure this successful integration occurs without adverse effects on the NHLD.

San Francisco's new Main Library is a good example of a major new building successfully incorporated within a National Landmark Historic District (i.e., within San Francisco's Civic Center). On a much smaller scale, additions to the Presidio Fire Station, and the new clubhouse at the Presidio Golf Course demonstrate the successful integration of new construction at the Presidio. The planning guidelines contained in Chapter Three of the Final Plan are designed to ensure that any new construction respects the character-defining features of its context, and that adverse effects to the District are avoided. The Plan's commitment to public review of all new construction save the most minor building additions, combined with the process prescribed by the Programmatic Agreement for consultation and compliance with Section 106 of the National Historic Preservation Act, will ensure that these guidelines are effective, and that new construction does not adversely affect adjacent buildings, landscapes, or the District as a whole.

Certainly many questions remain regarding the potential for replacement housing. Among these are how many dwelling units can be created by dividing large units into smaller ones, and how many units can be created by converting existing non-residential buildings to residential use. Importantly, the question remains how and where new construction could occur. These questions will require further analysis, and the intention of the PTMP is to provide a general direction or framework within which to seek the answers. Discussions of how housing should be replaced and concerns about new construction are addressed further elsewhere in these responses to comments.

HO-2. ***Existing Housing Supply***

Some commentors question the way in which the existing housing supply at the Presidio was characterized in the Draft Plan and EIS, and ask that the numbers be substantiated. ("We question the Draft's assumption that 1,650 housing units exist currently.") They believe family housing units and SRO/dorm units should not be combined "as though they provide the same quantity and quality of housing to meet household demand." They ask why the 538 group quarters "such as barracks and hospital beds" are grouped with conventional dwelling units.

Commentors suggest that the 1,654 "housing units" inappropriately include unused attic space in several Main Post buildings, and historic portions of the Public Health Service Hospital building – all of which have been converted into "virtual" units for planning purposes. They suggest that space was "double counted" because 200 SRO units were assumed to be the second floor of buildings designated for cultural/educational use at Fort Scott. ("A Trust representative has told me you currently have roughly 1089 non dorm/barracks/SRO/attic housing units (not all of which are rentable), plus 18 units in a converted nurse's quarters. I ask that you confirm and/or clarify all of this in the final Plan and EIS. Which units are actual, which are virtual, and how many are currently available for occupancy.") One commentor suggests that the Trust should include proposed conference, bed and breakfast

and lodging beds in housing unit counts in keeping with the former temporary use of many of these structures.

Response HO-2 – The Final Plan has clarified that the Presidio currently contains 1,116 conventional dwelling units and 538 group quarters (barrack, dormitories etc.). Approximately 80 percent of the dwelling units and 25 percent of the group quarters are either currently occupied or have been occupied in the last year. These accommodations were in use when the Army occupied the Presidio, and are reflected in the 1990 census, which reported a residential population in the Presidio of 4,700 individuals. The neighborhood/street – and in some cases the building location – of the Presidio's residential accommodations are provided in Appendix E in the Final Plan. Neither the units nor the group quarters included on the list are "virtual" and none has been "double counted." Attic space in Main Post buildings, hospital beds, historic potions of the PHSH building, and any other spaces that have not historically accommodated residential use are not included in these totals.

There are several areas where the number of residential accommodations reported as existing are clearly subject to change under the Plan. These include the Nurses Quarters near the PHSH, which are currently being used for non-residential uses on an interim basis, and which under the Plan may again be used as group quarters, may be converted to conventional dwelling units, or may remain in non-residential use. Another example is some of the barracks buildings around the main parade ground at Fort Scott. These buildings were historically used as groups quarters and are considered by the Plan to include 159 such accommodations. These buildings have been vacant for some time, and were proposed for use as lodging in the 1994 GMPA. Under the PTMP, these buildings could accommodate dormitory style residences, could be converted to conventional dwelling units, or could be converted to non-residential use. These buildings are vacant and the possibility that they may be used for non-residential purposes does not affect their description as "existing" within the Plan and EIS. Market conditions and the demand for housing will be among the factors that help determine the ultimate use of these residential buildings over the life of the Plan.

HO-3. ***Housing Demand***

Several commentors disagree with the housing demand calculations in the Draft EIS, suggesting that demand for housing by Presidio-based employees was both overstated and uncertain. The Sierra Club suggests that the Trust's housing analysis contained errors and used questionable assumptions, and asks that the Trust lower its assumptions about office employment density, using current employment densities at the Presidio rather than a regional standard, and using average rental rates, rather than the lowest rental rates available for each unit to determine demand. The Sierra Club also suggests that the Trust revise its assumption of 1.25 employees per Presidio household and suspect the actual ratio is higher than assumed and will therefore reduce the demand for separate housing units.

By adjusting the office employment density alone, the Sierra Club suggests that the demand for family housing units would be 948 rather than 1,134 as suggested in the Sedway study. They also suggest that after demolition of all scheduled units, subdivision of existing units, and conversions, the supply of 1,000 family units and additional SRO units will be sufficient to meet demand either under the Draft Plan or the Sierra Club's Revised GMPA alternative. The Sierra Club requests that the Trust specify a realistic timetable for determining actual employment and related Presidio-based housing demand. Another commentor pointed out that future demand for housing at the Presidio is uncertain, and requests that the Trust clarify how demand will be measured.

Response HO-3 – Future projections – whether of employment or housing demand – are by nature uncertain, and can best be supported by using generally accepted methodologies, relevant input data, and defensible assumptions. The Trust's analysis complies with this standard and is therefore entirely reasonable. In contrast, the commentor suggests use of methodologies in pursuit of a desired conclusion that is unsupportable.

For example, environmental analyses conducted by the Trust, the City and County of San Francisco, and other jurisdictions in the Bay Area routinely use employment densities that provide a reasonable representation of conditions over time. Specifically, the factor of 350 square feet per office employee is a reasonable standard for office developments outside the central business district, such as the Executive Park development on the southern boundary of

San Francisco. The standard used for office developments closer to the center city, such as in the South of Market Street or Mission Bay districts of San Francisco, is 275 or 295 square feet per office employee.

In economic boom cycles, when office vacancy rates drop and rents rise, employers can often squeeze in more workers, increasing the employment density. This occurred in recent years, when "dot.com" type businesses were routinely experiencing overcrowding, with employment densities of 150 square feet per employee or less, because of both the absence of space, and the number of growing businesses. Conversely, in lean economic times, or where a lot of vacant space is available at more affordable rents, employers can allow their workforce more room, lowering the employment density. It would be unreasonable, however, to expect either condition to continue indefinitely or to represent the norm, and therefore it would be unreasonable to use either condition as a standard for projecting the use of office space over time.[2]

The PTMP is a policy framework that will guide decisions over the next 20 to 30 years, and it would be unreasonable to assess the Plan based on a survey of existing employment densities, because there is so much vacant office space at the Presidio, including some that was leased by the NPS at below market rents. As buildings are filled, and as market rents are achieved, there will be a financial incentive for office tenants to utilize space more efficiently and densities will no doubt rise. A more defensible analysis – providing a conservative estimate of potential project impacts – uses a reasonable representation of conditions over time, such as the 350-square-feet-per-employee standard used by the City to analyze the Executive Park development. Using this standard and the amount of space assumed to be in office use under the PTMP, office employment at the Presidio in 2020 would equal 5,189 workers.

Total housing demand is a factor of employment, calculated by dividing the number of employees by 1.563, which is the estimated number of workers per household in 2020 provided by the Association of Bay Area Governments (ABAG). The commentors do not appear to question this calculation of total housing demand, or the relative insignificance of housing demand associated with all alternatives when assessed within a regional "impact area" (Draft EIS, Table 39). Instead, the commentors focus on the estimate of "adjusted" demand – meaning the number of employees who will actually want to live at the Presidio, based on their individual situations and on the rent structure in place when the analysis was conducted.

In calculating this adjusted demand for Presidio housing, the EIS analysis used the lowest average rent across all neighborhoods for each unit type as the cut-off point for calculating net demand for that unit type. In other words, potential Presidio residents who could not afford the minimum average rent for that unit type based on their household incomes were not factored into the demand for that unit type. If the analysis had used the mid-point of the average rents for each neighborhood as suggested, this would have underestimated demand by removing from the estimate households that could afford many of the units. Also, the commentor's premise that the current supply of units at the average minimum rent represents only a small part of the total supply of units is flawed. Approximately 62 percent of all the units surveyed were within 10 percent of the rent level identified as the "average minimum rent." Approximately 74 percent are within 20 percent of the average.[3]

Calculating the adjusted demand for Presidio housing also required an estimate of the number of Presidio-based employees per household. The Presidio's housing management company, John Stewart Company, estimated an average of 1.25 by reviewing their database of Presidio residents.[4] Although an actual survey of Presidio households could refine this average,

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[2] In a January 22, 2002 memo to the Trust, the Sedway Group notes that the Urban Land Institute reports that it is not uncommon for office buildings in some areas to average 175 square feet per employee, with 200 to 300 feet per employee being the norm. This memo is incorporated here by reference, and is available for review at the Presidio Trust Library.

[3] Ibid.

[4] Presidio Trust Housing Demand Analysis, Sedway Group, July 26, 200, page 5.

there is no evidence to suggest it is inaccurate or inappropriate for use in the assessment of adjusted housing demand over the 20- to 30-year life of the PTMP.

As stated earlier, projections of future conditions – whether related to employment or housing demand – are by nature uncertain. Thus, though projections can be supported as a reasonable basis for analysis of potential impacts over time, actual employment levels and actual housing demand will need to be determined by surveys or measurements undertaken at specific points in time. This fact is acknowledged in Chapter Four of the Final Plan, which describes monitoring housing demand as part of monitoring the Plan's overall effectiveness. It should be noted, however, that until the Presidio is fully occupied – which is not projected to occur for 20 years or more – surveys of actual employment and housing demand will have to be supplemented with projections to determine likely conditions at 100 percent occupancy. Thus, uncertainty will remain, along with the need to undertake reasonable analyses using generally accepted methodologies, relevant input data, and defensible assumptions.

HO-4. ***Who Benefits from Presidio Housing***

Many comments address the issue of who should benefit from housing at the Presidio and how units should be made affordable. The question is asked whether housing would be affordable for workers within the park and what subsidies would be offered. They suggest that if housing is not made affordable to workers and occupied by them, that it should not exist within the park. Some commentors suggest that using housing solely for Presidio-based employees would be too restrictive – like the company towns of the early industrial revolution – and that more diversity would result in a stronger community, which is less "exclusive" and "insular." One individual states "Such a policy would dilute the potential for the social vigor and diversity found in the open communities that form the strength of this country. As the Bay Area's occupancy demand rates have grown and are forecast to grow (DEIS Table 12) it would be socially unwise to close this community's potential to a few of the market-based households, and the ideal of a community." Some commentors suggest that the demise of the "dot-com frenzy" should remove any pressure on the Presidio to provide housing for San Franciscans at large, and that the original GMPA concept of offering first access to employees working or participating in programs at the Presidio should be perpetuated.

UCSF expresses an interest in student housing and related educational opportunities, asking that the Plan be more specific regarding the types of proposed residential uses, the number of units that will be made available to non-Presidio employees, the potential tenants and institutions that may qualify for the housing, and whether or not rental rates below market will be available within each planning district. San Francisco Beautiful, supportive of using housing for Presidio-based employees because of transportation benefits, suggests that "should there be times when the housing stock exceeds Presidio demands, the Trust could consider opening the excess to Golden Gate Bridge District employees who work in or around the toll plaza."

Some suggest that low-income housing would be inappropriate, and would not be maintained properly. One individual advises "Do not use the housing stock as an attempt to address the shortage of low income housing in San Francisco. Use the housing to generate revenue, we'll need it." Others devote substantial attention to the issue of affordability. See Response HO-5 below. Suggestions to use the housing for the homeless are countered by suggestions that the homeless not be allowed, with some suggesting that the Trust "charge the going rate of rental in SF times 1.5, and please be very strict in renting policies." Other suggestions include housing short-term interns (such as AmeriCorps) in the Presidio, using Wherry Housing for medical and San Francisco State students, and renting the housing at market rates, with the park staff given precedence at a lower rate.

Response HO-4 – Comments expressing preferences for who should occupy Presidio housing demonstrate the wide variety of opinions regarding this issue. While it would be infeasible to satisfy everyone, Chapter Two of the Final Plan does provide clear statements regarding housing preferences and occupancy:

> "The Presidio Trust will continue to give housing preferences to full-time Presidio-based employees as a way to accommodate employee housing demand and reduce automobile traffic in and out

> of the Park....Remaining units will be made available to the general public."
>
> "Rehabilitating and converting historic non-residential buildings to residential use may prove to be an excellent historic preservation strategy regardless of the demand for housing by Presidio-based employees....For that reason, senior housing or other residential uses...[including] housing that supports an educational institution" may be considered."

Housing provided in other alternatives would either be wholly consistent with these statements, or would be exclusively reserved for Presidio-based employees.

The Plan is programmatic in nature and its policies and objectives will be used to guide future decisions. The Plan does not and cannot prescribe precise numbers of units, precise rents or affordability criteria, or the precise mix of occupants. These results will be determined as buildings are rehabilitated, as housing demand and employment are monitored, and as evolving market conditions intersect with overall Plan objectives.

HO-5. ***Housing Affordability***

Housing affordability is addressed in some detail by a number of commentors, many of whom feel that the Presidio should provide housing at a full range of pricing to match the Presidio workforce pay scales. The City and County of San Francisco Planning Department points out that the "affordable housing issue is discussed only briefly in the Draft EIS and not at all in the Draft PTIP." Similarly, UCSF points out that there are also no stated principles regarding rental rates and whether or not any "below market" housing will be offered. Others ask what the incomes will be of households of permanent residents of the Presidio, and what the ethnic and racial make-up will be of the permanent residential population.

Commentors suggest that the Trust should make 10 to 15 percent of housing available to low-income tenants at subsidized rates, and that the Trust preserve a reasonable portion of the housing for students and families with children. Some suggest that a portion be designated as subsidized housing for the elderly, with elderly retired from the military receiving first preference. Others suggest that the Trust provide reduced housing rates for teachers, and that renters could be allowed lower rental rates in exchange for refurbishing the homes.

The strong sentiment is expressed that diversity adds strength in a community, and that the Trust should continue to support and expand ways to keep housing affordable for all socioeconomic groups. The Youth Commission's Culture and Urban Environment Committee asks the Trust to "preserve a reasonable capita of the housing stock within the Presidio for persons of low income, particularly youth of the ages of 18-23, as well as provide affordable housing for families with children."

Commentors suggest maintaining the current preferred rental program, and suggest changes such as raising or eliminating the current quota on program units, and accommodating more rangers and maintenance personnel. Presidio tenants suggest that the Trust provide an incentive package for nonprofit organizations that encourage their employees to work and live in the Presidio. Food Land and People offers "Perhaps the nonprofit employer could receive a reduction in office rental, and nonprofit employees who live at the Presidio could receive reductions in housing rent." San Francisco Conservation Corps believes "that the continuation of the preferred housing program, along with affordable leasing of space to non-profit organizations, will be vital for maintaining the diversity of the Park's culture."

Response HO-5 – Though the PTMP does not set aside a specific number of housing units as affordable, and presents the number of overall residential accommodations as a range from about 1,400 to 1,654 units, the Final Plan proposes to perpetuate a mix of affordable and market-rate housing opportunities by continuing current affordability programs, and adjusting them as necessary in the future. Adjustments that may be considered include revising rental rates, increasing the numbers of units within the program, and other suggestions provided by the commentors.

As stated in Chapter Two of the Final Plan, "The Trust currently provides discounts for some Presidio-based employees who earn less than median income, in order to enable them to live in the park. Rents for these units are set at rates that are consistent with national affordability standards. A public

safety housing program offers discounted rents to Presidio firefighters and U.S. Park Police officers. Dormitories and other single-room-occupancy or studio units accommodate one and two-person households at a variety of rental levels. These housing programs will be maintained and adjusted as necessary to accommodate a diverse tenant mix."

With the exception of housing for officers of the Presidio Fire Department and the U. S. Park Police, rental rates are not proposed to be based on occupation (e.g., lower rents for teachers or employees of non-profits). The Plan will continue to give housing preferences to Presidio-based employees and others. All income-eligible employees can participate in current affordability programs.

At present, approximately 80 percent of the conventional dwelling units and 40 percent of the other residential accommodations at the Presidio are occupied. Of these, about 19 percent of the dwelling units and 100 percent of the other accommodations are set aside indefinitely as "affordable," meaning that rents do not exceed 30 percent of combined household income. The following is a breakdown of those units:

Dwelling Units

1. Preferred Rental Program: 125 units set aside in five designated neighborhoods.

    - Units are available to full-time Presidio-based employees earning up to 100 percent of the area median income, as defined by the U.S. Department of Housing and Urban Development (HUD). Rents are equal to 30 percent of combined household income, including utilities.

2. Public Safety Housing Program: 40 units set aside throughout the park.

    - Units are available to designated full-time officers of the U.S. Park Police or Presidio Fire Department. Rents are equal to either 25 percent or 30 percent of an officer's salary, including utilities.

Single Room Occupancy Units

1. Letterman Apartments: 58 units in the complex, with 24 units currently available for leasing to one- and two-person households.

    - Units are available to full-time Presidio-based employees earning up to 100 percent of the area median income, with first preference going to people earning up to 50 percent of the area median. Monthly rents range from $475 to $525, including utilities.

In addition, single room occupancy units serve the Swords to Ploughshares organization, interns, and others at below the rates available elsewhere in the City.

Certain general demographic information is or will be available in the future. This includes data on average household size and the income levels of people participating in discount housing programs. Other information, including ethnicity, age, gender, etc., is either not compiled or not available for disclosure, per federal fair housing standards. Also, as discussed in Response HO-4 above, housing for seniors and housing that complements educational institutions may provide efficient ways to reuse historic buildings or support other desired land uses.

Because of the historic nature of many dwelling units, the Trust does not generally envision providing discounted rent to individuals who would fix up their homes at their own expense. However, if compliance with historic preservation requirements can be assured, there is a potential for limited use of this strategy and for longer-term leases than the current one- to three-year norm.

HO-6. ***Condominiums, Co-housing, and Long-Term Leases***

Related to the issue of who should benefit from housing at the Presidio, are questions and suggestions about how that housing should be made available. Commentors ask whether all housing at the Presidio will be exclusively rental housing, or whether condominiums will be allowed. Some suggest that units be set aside for co-housing, whereby several unrelated individuals share a large residence cooperatively, suggesting this as a "great solution in a city

with many single people and a housing shortage." Others suggest that permanent residents are needed to both maintain the tone of the Presidio, as well as to reduce crime and increase volunteer activity. ("People who own or have very long-term leases, have a strong interest in maintaining their neighborhoods. Establish architectural standards, then auction 99-year leases on the housing units to the highest bidders. Require that the lessees bring the interiors up to modern building standards at their own expense while keeping the old exteriors.") One commentor suggests that a portion of the housing units should be managed as time-shares or resort units.

Response HO-6 – The Presidio is owned by the federal government, and the Trust is precluded from disposing of the property by selling any portion. For this reason, traditional condominiums – where the occupant owns their unit – would not be feasible, and all the housing at the Presidio will remain rental housing.

The Trust does not currently lease dwelling units for longer than three years, although some group quarters – like those occupied by Swords to Ploughshares – have been leased for longer (i.e. ten-year lease with ten-year option). In the future, long-term leasing may be used as a strategy for funding the rehabilitation of historic resources and accomplishing other Plan goals. This strategy will be used carefully, however, because the Trust must not accomplish these goals at the expense of making the Presidio an exclusive enclave or resort – neither of which were the intention of the Trust Act. Co-housing and other non-traditional forms of housing are identified in the Final Plan as potential ways to reuse some large historic houses and ensure a diversity of residential tenants: "Both group housing and co-housing may also be considered as a way to reuse a limited number of large historic homes."

HO-7. ***Remove Housing and Do Not Replace It***

Some commentors suggest that housing is not an appropriate use within a national park, and therefore that all non-historic housing should be removed and not replaced. ("Providing housing for San Franciscans (regardless of financial status) should not be a priority for the plan. I support the preservation and reuse of the historic residential buildings but not the use of non-historic low-density buildings such as Wherry Housing or the building of new housing within the park. These structures should be phased out of use and returned to open green space. Public housing is San Francisco's problem, not the Presidio's.") These commentors typically suggest that all non-historic housing should be removed in phases over a projected 30-year period, similar to the schedule proposed in the Draft Plan for Wherry Housing. However, "If progress exceeds expectations, this schedule could be shortened."

Many feel that housing should be kept to a minimum (one commentor says "drastically reduced") in order to preserve the park, and are of the opinion that the remaining housing should be used only for Presidio-based employees. Many also indicate that when housing is removed, it should not be replaced, or it should be replaced only within existing buildings. The NPS recommends that "residential uses at the Presidio be restricted to existing structures, that the Trust must provide housing at a full range of pricing to match the Presidio workforce pay scales to support the goal of sustainability, and that housing areas proposed for removal be phased out as soon as financially possible to allow for parkland restoration." Another commentor suggests that no housing should be removed as long as rent revenues are essential to meeting the Presidio's financial self-sufficiency mandate; but once financial goals are met, and once the demand associated with Presidio-based employees is met, then non-historic housing should be removed.

Response HO-7 – The commentors state preferences for removing housing, keeping housing to a minimum, replacing housing only within existing buildings, providing housing at a range of rents, and using housing to generate rent revenues in the short term, and to house Presidio-based employees in the long term. Many of these preferences are addressed in the responses above, and are reflected in the Final Plan.

Under the PTMP, the square footage devoted to housing in the park will be reduced over time through the removal of non-historic buildings containing 565 dwelling units for open space expansion, and removal or conversion of a number of other residential accommodations to non-residential use (between 50 and 380 units.) Housing removal will be accomplished in phases once the revenue generated by the housing is replaced by other sources. The Trust will prioritize replacement of housing within existing buildings, and has as its goal accommodating Presidio-based housing demand. At build-out, the number of

residential accommodations will be between 1,400 and 1,654, and will never exceed the current number (1,654).

The following are not proposed: removing all housing; removing all non-historic housing; and precluding the replacement of housing in the park – whether within existing buildings or within compatible new buildings. This is because housing has always been an essential feature of the Presidio's landscape, and is critical to the character of the place. Housing can also help meet important plan objectives: residential use is a cost-effective way to preserve buildings and the most reliable source of long-term revenue; housing Presidio-based employees can minimize auto traffic into and out of the park; and residents add to the vitality, safety, and security of the park and its resources.

HO-8. ***Timing/Process for Housing Removal & Replacement***

Some commentors address the process that should be used for removing housing, indicating that the Trust should remove non-historic housing provided that new replacement housing is constructed first, that replacement housing should be provided in existing buildings prior to new construction, or indicating studies that should be accomplished before housing is replaced. ("Before additional housing units are considered, whether through adaptive reuse or new construction, studies being prepared to 'refine workforce demographics and housing demand projections' should be completed…") The Planning Association for the Richmond suggests that Wherry Housing should be removed in reasonable increments corresponding to the creation and leasing of replacement housing in reconfigured buildings. The Sierra Club letter suggests prior to removing Wherry Housing, the supply of existing housing in areas not scheduled for demolition should be increased to the maximum extent feasible through sub-division and conversions of non-residential buildings to housing. Acknowledging an ongoing tension between the goal of creating more contiguous open space and the need for replacement housing, SPUR indicates support for the objective of removing non-historic housing, provided that new replacement housing is constructed first.

Others ask the Trust to explain whether construction of all new housing will be delayed until after all planned subdivisions and conversions are completed, and to explain whether available residential units allocated to business tenants under PTMP will be reallocated to housing before construction of new housing takes place. Commentors suggest that the Trust should ensure that all existing housing is employee-occupied before providing replacement housing. They request that the Plan and/or EIS address the timing or sequence of implementation. ("Only the timing of Wherry housing demolition appears in the EIS description of alternatives.") They also wish to know where reuse and development is proposed to occur and when. ("The Trust's housing plan should specify a sequence of reconfigurations and conversions to increase the supply of suitable units.") One commentor states definitively that the Trust's housing plan should call for no new construction during the 20-year plan period. ("If it is determined later that construction of new housing should be considered, the Trust should conduct a revised housing planning process at that later time.")

Response HO-8 – The timing of housing removal will hinge on the cost of demolition and follow-on restoration of open space, the ability of the Trust to fund these costs, and the ability of the Trust to replace losses in revenue associated with removal of housing units. These factors suggest – as do the commentors – that housing removal will be phased incrementally over the next 30 years, as replacement housing is created, and as non-residential lease revenues increase.

As a policy document, the Plan does not specify an order in which specific activities will occur, but does anticipate that housing demand will be monitored over time, and will be reassessed prior to any new construction. To provide a rigid list of implementation actions – defining precisely where and when housing would be removed and replaced – is outside the scope of the current planning exercise, and would be unrealistic given the 20- to 30-year time frame involved, and the likelihood of changes due to external factors. The PTMP provides a policy framework for future implementation decisions that allows for adjustments in approach if market conditions change, if housing needs or household characteristics change, and when we learn more about where and how replacement housing can be accommodated.

At a macro level, the Plan anticipates that any replacement housing required to meet Plan objectives, such as housing Presidio-based employees or preservation of an historic building, will be provided before existing housing

is removed. This means that any employee-housing demand met by the existing units can be accommodated without interruption, with employees moving from one unit to another.

The Plan also indicates that providing replacement housing within existing structures will be a priority, although the number of units that can be created by dividing existing units or converting existing buildings to residential use is only generally understood at this time (anywhere between 270 and 570 units). Site-specific building assessments will be required to determine the actual potential. Many of these assessments, and the identification or implementation of many potential units will be undertaken prior to any proposals for new construction. New construction may, however, be considered before all replacement units within existing buildings are constructed. Consideration would involve additional analysis, public input, and agency consultation. While no additional Presidio-wide housing study is anticipated, any analysis of individual replacement housing projects will necessarily reference the assessment of potential cumulative effects contained in this EIS, and update or refine that assessment as necessary.

HO-9. ***Replacement Housing/Existing Buildings***

For those commentors who favor removal of non-historic housing and its replacement, a large number indicate support for replacement of housing within existing buildings. The NPS summarizes this sentiment, recommending that "the Trust rely on existing structures to provide any housing that is required … Conversion of non-residential to residential, or subdividing large units to smaller ones where compatible with historic preservation guidelines, should be used to meet housing goals… Only when it is not possible to convert existing structures into new smaller units should new housing be constructed." PAR suggests that the Trust revise the Draft Plan to state that the Trust will concentrate on renovating and subdividing existing buildings for housing instead of building new housing structures, and voices support for the subdivision of existing buildings for a reasonable amount of housing.

Many commentors point out that converting large units to smaller units is the most efficient strategy to provide additional housing, and one maintains that a detailed cost benefit analysis shows that keeping the significant housing infrastructure is the correct strategy both long term and short term. Commentors suggest that historic housing at Fort Scott, Main Post, and East Housing be rehabilitated and subdivided to the extent feasible to provide more, smaller units per building. Some couple support for dividing large residential units into smaller units with a suggestion that converting non-residential space to residential use be pursued diligently. ("The demand should be satisfied first through the conversion or rehabilitation of historic buildings and the designation of the PHSH for conversion to housing.") However, the Richmond District Democratic Club believes that the "cost to remodel, rewire, and replumb large housing units to create smaller ones would outweigh the revenue gained."

The Sierra Club suggests that the EIS analysis underestimates significantly the supply of family housing units after conversions, and suggests that with minimal expansions in square footage, large existing units could be subdivided into so many units, that when combined with conversion of some free-standing garages and basements with above-ground entries, the total supply could reach 1,010 units, even after non-historic units are removed.

Some commentors, opposed to the idea of new construction, support reuse of existing buildings because of fears that new construction could impair the National Historic Landmark District. Others suggest that new construction might be considered once subdivision and conversions were complete. ("If the reconfiguration of PHSH is infeasible, we would not oppose a limited amount of housing construction at the site.") For some, it is an issue of timing or priority. ("New housing construction should not be considered until all buildings that are suitable for conversion to housing or subdivision are identified and reused.") Others suggest that the potential reuse of existing buildings and reconfiguration of existing housing units should determine the ultimate housing count.

While there are many supporters of subdividing large units, some of who urge converting the Presidio's historic buildings into new and varied forms of housing, others advocate for retaining large family units, instead of creating many smaller studios. For some, the whole issue raises questions, such as "to what extent can existing non-residential buildings, both historic and non-historic, be converted to residential use?" And "Is a preference for subdividing

residential buildings into smaller housing units appropriate in light of the local shortage of housing for families?" "Are there existing nonresidential buildings, historic or non-historic that can be converted into residential use?"

The PHRA recommends that a new alternative should be analyzed which focuses on the subdivision of existing buildings to supply housing units for park employees – but only after the need for housing as been demonstrated. Others suggest that all large units (e.g., 1,000 square feet or larger) should be subdivided to make two units, and that smaller units would be more affordable. One individual remarks "The Presidio Housing Conversion Study... suggests the extent to which any additional Presidio housing needs can be met through conversion of existing buildings – with no new construction at all. Focusing on some 125 existing buildings which currently provide 289 housing units, the study shows how adaptive reuse and interior reconfiguration of those buildings could turn 289 units into 830 units; a net gain of over 500 units, with no deleterious impact on buildings which are historic. And that's just for the 125-odd buildings studied, which are only a small subset of the Presidio's total building stock!" Another commentor suggests that through subdivision of large non-historic buildings such as those at East Housing, North Fort Scott, and Washington Boulevard, and by converting portions of the PHSH to residential use, approximately 1,400 affordable units could be provided cost effectively.

Response HO-9 – The Final Plan is consistent with many of the commentors' suggestions, and identifies subdivision of existing large dwelling units and conversions of non-residential buildings to residential use as efficient ways to provide replacement housing within existing buildings. Three other alternatives assessed in the EIS, as well as the Final Plan Variant assessed in response to public comments, would also utilize subdivisions and conversions to create replacement housing. Attachment B to Appendix K in the Final EIS has been revised to clarify the number of units assumed to be removed, retained, or created under each alternative in a manner that is more understandable than that provided in the Draft EIS and in a manner consistent with Chapter Two of the Final Plan.

Because only one preliminary building-specific study of the potential for subdivision/conversion has been undertaken to date, it is unclear precisely how many units can be economically created in this way without adversely affecting historic structures. As described in Chapter Two of the Final Plan and noted by a commentor, the Presidio Housing Conversion Study concluded that unit subdivisions were worthy of consideration in many of the buildings investigated. Specifically, the study reviewed a subset of all Presidio buildings and concluded that "some building types offer the Trust a good opportunity" for subdivision or conversion, "and can be reasonably pursued," that others "are worthy of more study… but may be more suited to other uses," and that some appear "quite unpromising." Of the 135 buildings examined, 57 were considered to have "high" suitability, potentially resulting in 243 new units. This conclusion was "intended only to suggest which buildings are more promising that others … [and was not intended to] be used for budgeting."

Based on this initial assessment – which included analysis of some of the most likely buildings with potential for new units – the Plan estimates the number of new units that could be created at anywhere between 270 and 570, and anticipates that further building-specific investigations will be undertaken. For example, further study of the Public Health Services Hospital will be required to determine both how many residential units can be accommodated, and how many would be required to generate the revenues to make rehabilitation of the building financially feasible.

The suggestion by the Sierra Club that small building additions would allow large units to be divided into multiple smaller units also requires further site-specific investigation to determine physical and financial feasibility. Many Presidio buildings – those in the East and West Washington neighborhoods, for example – have simple floor plans that easily lend themselves to subdivision; in this case from two four-bedroom units to four two-bedroom units. Other buildings are less easily understood, and would require careful analysis. Even if physically feasible, subdividing some units may not be financially justifiable if the cost of vacating the units, installing additional kitchens, and making other required improvements cannot be amortized over a reasonable period of time.

The Final Plan does not comply with the suggestion of some commentors that subdivisions and conversions be used as the only means to provide

replacement units, nor does it eliminate the potential for some new construction before all potential subdivisions and conversions have been identified or implemented. Instead, the Final Plan suggests that both subdivisions/conversions and new construction will be pursued as replacement strategies if needed to meet Plan objectives, and provides quantitative, qualitative, and procedural constraints on the number of total units, and the number provided through new construction. The number of units will not exceed the current supply of 1,654, and the number replaced via new construction will not exceed 400. New construction would only occur in already developed areas, would be compatible with the National Historic Landmark District, would comply with the planning guidelines contained in Chapter Three of the Final Plan, and would be subject to additional analysis, public input, and agency consultation consistent with requirements of NEPA and the NHPA.

HO-10. ***Replacement Housing/Infill Construction***

Many commentors oppose new construction, and therefore oppose replacement housing if new construction is involved. These commentors challenge the Trust to justify why new construction is necessary to achieve housing goals, and question those goals. ("No construction of new housing should be included in the Plan.") These commentors suggest that the Trust must provide stronger justification in the EIS and supporting documents for new housing construction, and must show that new housing construction is "unequivocally essential" during the 20-year Plan period.

Many of those commentors who do not oppose new construction per se ask that the Trust consider new construction of housing only as a last resort when reasonable alternatives are lacking. ("New housing should only be constructed to satisfy Presidio-based demand and only after all possibilities for conversion and rehabilitation have been exhausted.") Commentors suggest that the Plan be amended to make clear that no new housing construction will be undertaken until the inventory of all buildings that may feasibly be converted to housing or appropriately sub-divided is exhausted. The CCSF Planning Department states likewise "Only when it is not possible to convert existing structures into new smaller units should new housing be constructed."

Some commentors, including the Sierra Club, urge that the Trust explain to the public the basis for any new construction of housing to satisfy Presidio-based demand and guarantee public involvement in the review process. The Sierra Club noted the process for public involvement in Trust major decisions affecting use of existing buildings, demolition and new construction is not assured. One commentor states "The arbitrary condition that there be no loss of residential housing units has a large influence on the PTIP and the national park in general. Please explain how an arbitrary decision with such important impacts to the Presidio's future can be made without public discussion, EIS analysis or conformance to national park guidelines."

Some commentors ask that the Trust limit new construction to replacement of removed structures and to locations consistent with resource protection. The NPS asserts "New construction in the Presidio should only be considered when no reasonable alternatives exist and when it can be clearly shown that there will be no adverse effects on the cultural and natural resources." Other commentors offer different suggestions about the location of replacement construction. San Francisco Beautiful indicates support for removal of all non-historic housing and associated infrastructure in the South Hills, and along Quarry Road and MacArthur Avenue in East Housing. Along with this, the organization supports replacement within other housing complexes, primarily on the periphery of Fort Scott, at West Letterman, and in a rehabilitated PHSH and its immediate surroundings. ("If that proves insufficient, East Housing might take some infill… Infill housing should exhibit historically and architecturally compatible design, massing, and materials, and be sized appropriate to the Presidio's residential market.")

Others suggest that if new housing construction is justified by Presidio-based demand, the Trust should look to infill opportunities first in the southern portion of the PHSH district, second in north and east Fort Scott, and third in the West Letterman area. One commentor specifically opposes any additional housing in the Letterman district. Another states the conviction that new housing properly sited can be of the quality a national park deserves. Another asks that the footprint of housing be dropped dramatically – with higher rise buildings preferred.

Commentors ask for more specificity in the Plan, requesting that the Trust explain its intentions as to what time, under what circumstances and in what planning districts new housing will be constructed. Other questions include: where would replacement units occur? While adjacent transit is highly desirable, are the highest activity areas appropriate for housing? What is the financial justification for removing housing units and replacing them with new, more expensive units? How will this benefit lower income employees at the Presidio? UCSF asks for clarification as to how many housing units exist or are proposed in each planning district, and how many would be available to other entities.

Response HO-10 – The Final Plan suggests that replacing housing that is removed to expand open space or preserve historic buildings is likely to be critical on several levels. First, replacement housing will likely be needed to satisfy employee demand, reducing traffic in and out of the park, and as a way to preserve historic buildings and complement proposed uses (such as educational institutions). Also, replacement housing would provide a reliable source of income, would perpetuate a historic land use, enforce an overall sense of community, and contribute to the safety and security of the park. Chapter Two of the Final Plan provides more detail on these issues.

As noted in previous responses, the Final Plan suggests that both subdivisions/conversions and new construction will be pursued as replacement strategies, as do three other alternatives considered in the EIS. In the Final Plan, this dual approach to replacement housing is based on several factors. First, based on the number of housing units that are proposed for removal to create open space (565), on the additional number that may be removed or converted to non-residential use to facilitate preservation and reuse of historic buildings (50 to 380), and on the potential for replacement within existing buildings (270 to 570), some new construction is likely to be required.

Second, there are areas in the park where existing non-historic housing is both unattractive and inefficient, and replacement with new construction could enhance the appearance of the park and the character of the National Landmark Historic District. The area immediately west of the Thoreau Center is one such location, where 58 units of non-historic housing is provided in concrete block dormitories that could be replaced with new construction more compatible with the NHLD and more in keeping with the scale and architecture of the low-scale hospital buildings that historically occupied the site. This site is illustrated in Chapter Three of the Final Plan, in an artist's rendering that suggests one possible configuration for the site.

Commentors who fear that new construction cannot be accomplished without impairing the NHLD, and who seek more specifics regarding the location of new construction, may take comfort from local examples of compatible new construction cited elsewhere in these responses, and from the quantitative, qualitative, and procedural guidelines provided in the Final Plan. The number of total units will not exceed the current supply of 1,654, and the number replaced via new construction will not exceed 400. New construction would only occur in already developed areas, would be compatible with the NHLD, would comply with the planning guidelines contained in Chapter Three of the Final Plan, and would be subject to additional analysis, public input, and agency consultation consistent with requirements of NEPA and the NHPA.

Commentors who fear that subdivision of larger units into smaller ones will result in less affordable units and diminish the supply available to families, may be interested in the unusually large supply of very large units at the Presidio, and the projection of demand undertaken by the Sedway Group. At the time the demand study was undertaken, 725 dwelling units were occupied, and over 25 percent of these were four- and five-bedroom units. Forty-five percent were three-bedroom units. For the Final Plan, the adjusted demand for housing (i.e. Presidio-based employees desiring housing at the Presidio) was estimated to be more weighted towards smaller units, with 65 percent desiring one- and two-bedroom units, 22 percent desiring three-bedroom units, and only 13 percent desiring four bedrooms or more.[5]

Because these projections are just that – projections – and therefore subject to change, they point to the need to further assess demand over time as the feasibility of subdivisions are investigated, and as they are implemented. The Final Plan would monitor housing demand, and commits to maintain a diversity of unit types. The number of overall units provided in each planning

[5] Sedway Group, Presidio Trust Housing Demand Analysis, July 26, 2001.

district is presented in Chapter Two, usually in terms of a range of possible outcomes depending on future implementation decisions. Presidio-based employees will continue to receive preference for housing, and are expected to occupy most units at build-out of the Plan. In the interim, opportunities for housing are provided to the general public, although the precise number available at any specific point in time cannot be determined with certainty.

The Final Plan Variant assessed in the EIS would provide replacement housing solely within existing buildings, and thus provides the commentors with some sense of the impacts and benefits associated with this strategy. Again, because the number of units that would be converted to non-residential use and the number of replacement units that can be achieved within existing buildings is not known with certainty, the effectiveness of this strategy can only be estimated. As presented in the Final Plan Variant, approximately 970 units would be demolished or removed, about 430 units would be replaced, and about 1,100 total units would be available – or about 540 less than exist today. Housing totals for the Final Plan Variant were calculated based on maximizing conversions or subdivisions of existing buildings with no new construction. Based on the suggestions of commentors, the same housing units were removed in the Variant as in the Final Plan, with the few additional removals on Sanches. No housing was removed for construction of infill housing. To obtain the maximum number of units within existing structures, all buildings were subdivided into the maximum number of units regardless of cost or suitability based on the Presidio Housing Conversion Study by Page & Turnbull, Inc., Solomon E.T.C. Some residential buildings were converted to non-residential uses such as education or lodging. All of the historic Public Health Service Hospital was converted to residential use.

See Response HO-1 regarding the no net loss of housing policy for clear demonstration that related housing issues are not being pursued ("without public discussion"). Also see Response HO-17 regarding NPS housing policies, and responses to New Construction comments.

HO-11. ***Don't Remove Any Housing***

Several commentors disagree with the Plan's proposal to remove housing, providing the following reasons: replacing housing is a lengthy and difficult process; investment in replacement housing will be orders of magnitude greater than rehabilitation costs, and rehabilitation can extend the useful life of units for 30 to 50 years; returns on capital invested in existing units will be substantially greater than returns on new units; and existing units provide an affordable housing component for low-income families and students. ("We do not feel that Wherry, East & West Washington Housing or any other potential housing should be demolished and rebuilt elsewhere. Demolition of existing income-producing housing is not consistent with the Trust's mandate for financial self-sufficiency.")

These commentors assert that housing should remain where it is now, with one suggesting that the proposed demolition of Wherry and other housing does not meet the Presidio Trust Act's requirement that buildings be removed if they "cannot be cost-effectively rehabilitated." The commentor suggests that the buildings in question do not need rehabilitation, and the Trust Act authorizes demolition of only those structures which need rehabilitation that cannot be done cost-effectively. Another suggests that preservation of rare plant species is not a credible reason to remove Wherry Housing. ("Page 106 of the DEIS cites an instance of successful replanting of a colony of the SF Lessingia by the US Army. It would seem that we should be able to do at least as well as the army in ensuring the survival of these rare plants without demolishing the Wherry housing.")

Response HO-11 – The commitment to remove Wherry Housing is a longstanding one, first articulated in the 1994 GMPA, and is founded on an

understanding that the area can provide habitat to assist the recovery of the San Francisco lessingia, a special-status plant species.[6]

From a financial perspective, the commentors are correct that removal of housing and replacement elsewhere is not cost effective. Thus, this commitment points out that financial self-sufficiency is not and cannot be the Trust's only goal. Other goals include increasing the amount of open space, enhancing open spaces to provide critical habitat for native species, preserving historic buildings and landscapes, and making the park increasingly accessible to the public. With that said, the Trust cannot responsibly undertake the removal of housing until it is financially feasible to do so – in other words, until funds are available for demolition and habitat restoration, until the resulting revenue loss can be made up elsewhere, and until the costs of any replacement housing required have been accounted for. It is primarily for this reason that removal of Wherry Housing is projected to occur in phases over a 30-year period.

Trust Act requirements regarding development of a management program, which must include demolition of structures that cannot be cost-effectively rehabilitated, should not be viewed as prohibiting demolition in other instances. No legal constraints would preclude removal of housing when financially feasible.

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[6] Commentors are encouraged to consult the U.S. Fish and Wildlife Service's Draft Recovery Plan for Coastal Plants of the Northern San Francisco Peninsula, 2001 for a description of the plant species, its habitat, and the proposed recovery strategy. While the proposed recovery area is larger than Wherry Housing, and thus clearly anticipates that the species can be established elsewhere, Wherry Housing remains an optimal location for recovery of the species. The Trust is not in agreement regarding all aspects of the Draft Recovery Plan and has provided comments to the USFWS. These comments suggest bringing the timing of removal of Wherry Housing and restoration of native plant communities into conformance with the timing suggested in the Final Plan.

HO-12. ***Wherry Housing***

Views on the disposition of Wherry Housing vary widely, with many commentors supporting its removal in phases, but offering some suggestions regarding phasing, timing, and replacement. Some commentors suggest that all or a portion of Wherry Housing should be demolished in 2012 or 2013, with any remaining portions demolished in 2020, and the demolished areas restored as open space. The Sierra Club and others suggest "that the Trust proceed with the clear mandate to reduce housing at Wherry and MacArthur in stages, with one third removed by 2013 and the balance by 2020" or on a timetable consistent with the USFWS [Lessingia] Recovery Plan. NAPP and others suggest that Wherry Housing should be retained for as long as necessary to ensure the Presidio's financial self-sufficiency and to establish an appropriate reserve – but that once its usefulness has been exhausted, it should be removed and not be replaced. PAR and others suggest that Wherry Housing should be removed and the natural landscape restored at the earliest possible opportunity. ("...PAR believes that the Wherry structures should be removed in increments corresponding to the creation of any replacement housing on the Presidio, which would preferably be accomplished through the reconfiguration of existing buildings elsewhere on the Presidio... The removal should occur in reasonable increments, such as thirds, as soon as a corresponding number of reconfigured housing units becomes available for leasing. The demolition should not be delayed until some unspecified future time.")

Some commentors specifically address the objective of habitat restoration. ("We agree with the PTIP proposal to remove Wherry Housing. This will enable the recovery of the endangered Lessingia along with coastal scrub habitat.") These commentors often ask for a faster timeframe for removal and habitat restoration. ("Habitat restoration and subsequent adaptive management may take many years to bring reliable benefits to target species. We therefore recommend that the Trust suspend commitment to the 'one third/2030' schedule in the DEIS, and instead strive to complete demolition of Wherry Housing and restore coastal dune habitats of San Francisco lessingia at the earliest feasible date, in coordination with the National Park Service and the USFWS.") Some commentors suggest that to do otherwise would be harmful to the endangered species. ("The Wherry Housing complex is right in the

middle of suitable areas for restoration activities and has long been slated for removal and for restoration with dune vegetation. By extending the time frame for complete demolition to 2030, for strictly financial reasons, the Trust will stall endangered species recovery for decades. We strongly urge the Trust to reconsider this decision and commit to the complete demolition of Wherry Housing as early as possible.")

It was pointed out that there are natural limits on annual capacity to restore dune habitats, requiring phased demolition and restoration, and thus that the original GMPA schedule of full removal by 2004 is unrealistic for biological as well as financial reasons. The suggestion is made that revenues generated at Wherry Housing should support ongoing restoration activities (and hence endangered species recovery) until 2012 or 2013, when, consistent with the No Action Alternative (GMPA 2000) and the commentor's preference, the entire complex should be removed.

Some commentors are concerned that a timeframe longer than 10 or so years would inevitably end in delays, and remind the Trust that its mandate of financial self-sufficiency by 2013 does "not trump or overrule its affirmative obligation under the ESA to recover listed species. Phased demolition and interim leasing may help ease the apparent conflict, but not if the demolition is delayed for decades." Another commentor writes "I ask that the Trust explain exactly why it is better to remove Wherry Housing earlier rather than later?" Some commentors, including the Neighborhood Association for Presidio Planning and the Cow Hollow Association, recommend that the Trust retain Wherry Housing as long as necessary to ensure the Presidio's financial self-sufficiency. Others simply raise concern over lack of specificity regarding the timing of Wherry Housing's removal, and suggested that an outside deadline (such as 2033) be set for its removal.

Response HO-12 – Four different scenarios for removal of Wherry Housing are analyzed in the EIS. The No Action Alternative (GMPA 2000) would remove all of Wherry Housing between 2010 and 2012; the Final Plan Alternative and the Final Plan Variant would remove Wherry Housing in three phases, starting in 2012 and ending in 2030; the Resource Consolidation, Sustainable Community, and Cultural Destination Alternatives would remove Wherry Housing in two phases, starting in 2012 and ending in 2020, and the Minimum Management Alternative would not remove Wherry Housing at all. The two-phased removal scenario is most consistent with the USFWS' Draft Recovery Plan cited above, although that plan does not compel the Trust to adopt the two-phased scenario.

In all alternatives, removal of Wherry Housing could not be undertaken until financially feasible, and there is therefore a potential for delay. In other words, the housing cannot be removed until funds are available for demolition and habitat restoration, and until the resulting loss in rental income can be sustained without jeopardizing preservation and operation of the park. (The timing of removal in relationship to creation of replacement housing is addressed in Response HO-8, above.)

The ability of the Trust or any agency to physically restore habitat is another potential schedule determinant. Habitat restoration is labor intensive, and requires sufficient seeds and plant stock, as well as other landscape materials and equipment. Critical to the success of restoration efforts is the availability of limited genetically-appropriate propagules, staff, volunteer and funding resources necessary to plan, implement and maintain these efforts, as well as public support. An equally important consideration is the cumulative effect of these restoration activities, and ensuring that they do not significantly disrupt already fragmented wildlife corridors, nesting habitat for locally rare bird species, or increase competitive pressures for invasive non-native species that quickly colonize the newly opened and disturbed habitat. To date, both NPS and Trust staff have established annual thresholds limiting the amount of newly initiated projects that would expose habitat requiring restoration annually, based upon the above concerns and upon more than a decade of past restoration experience working both with the natural resources and the local community. The result has been the establishment of a balanced and iterative approach to the restoration of the Presidio's ecological resources, based upon adaptive management, community participation, and strong resource education.

The capacity for habitat restoration is one important reason that the Final Plan proposes to adhere to the three-phased scenario for removal of Wherry Housing. Another reason is that the housing itself is an important community resource, and the Trust's commitment both to sustainability and to providing a

diversity of housing supports the idea of phased removal over an extended period. Thus, while financial considerations are clearly a factor, the three-phased scenario is not included "for strictly financial reasons." This scenario would also not "stall endangered species recovery for decades," since the Plan's phased implementation schedule would ensure that long-term recovery objectives are feasible and would therefore secure the long-term restoration of the lessingia.

HO-13. ***East/West Washington Housing***

Commentors provide a variety of perspectives regarding housing proposed for retention along East and West Washington Boulevards. Some suggest that open space in the South Hills district should be expanded by relocating, over time, the non-historic housing on West and East Washington Boulevard, asserting that the area's biodiversity and its educational value can be enhanced if more land is restored, potentially as quail habitat. The Golden Gate Audubon Society, citing the Quail Restoration Plan, states "it is clear that the removal of East and West Washington housing and its restoration to Quail appropriate habitat would be very beneficial to Quail populations. Such removal and restoration would also go far in increasing the utility of these newly opened areas to other wildlife."

It is pointed out that removal of all housing along Washington Boulevard would permit the creation of "a wide band of open space with high environmental, biological, and recreational value" and that Washington Boulevard is relatively inaccessible via car or transit so it "makes sense to relocate these dwellings over time." It is also suggested that retaining and subdividing the large units in these areas would increase the residential population and subsequent environmental impacts.

Regarding West Washington, the California Native Plant Society notes that "Phased demolition of these buildings and restoration with native plant communities would add considerable value to restoration efforts on adjacent lands. Increasing the area of contiguous natural landscape is an important principle of conservation biology and would help the California quail that are regularly seen at that intersection. Restoring landscape vegetation to these areas following removal makes little sense. The areas should be restored to native vegetation if the buildings are removed." CNPS offers more specific observations regarding the East Washington area: "Previous investigations by the Trust or its partners have revealed that serpentine-derived soils occur under several acres now covered by landscaping and housing units. If there are opportunities to remove these housing units, then we strongly support the restoration of serpentine grassland habitat for Presidio clarkia and other rare species in that location."

Other commentors assert that the Trust should retain East and West Washington Housing for subdivision/reconfiguration and reuse, and consider their demolition only in the long-term when financially viable, and "establish an east-west wildlife corridor as has been suggested by many naturalists." Some state clearly that the Trust should not make the near-term removal of East and West Washington Housing a high priority, and the Trust does consider the removal of housing on Washington Boulevard. The following factors should be taken into consideration: (1) East Washington (built 1948) should be evaluated for its contribution to the National Historic Landmark District; (2) buildings should be removed only to restore native habitat or historic forest and to maintain trail access; (3) removal of West Washington should not trigger new construction; (4) priority should be given to removal that will allow restoration of important serpentine grassland habitat and forest zones; (5) the priority of restoration in this area should be evaluated against the desired priority of other restoration projects; and (6) traffic impacts of closing Washington Boulevard should be thoroughly evaluated.

Response HO-13 – The fate of housing along East and West Washington is presented differently in various EIS alternatives, and thus all scenarios suggested by the commentors are analyzed. The No Action Alternative (GMPA 2000), Sustainable Community, and Minimum Management Alternatives would retain all of the existing housing units; the Final Plan Alternative and the Final Plan Variant would remove approximately 36 units (30 west of Battery Caufield Road, and 6 along Amatury Loop); and the Resource Consolidation and Cultural Destination Alternatives would remove all the existing units.

Under the Final Plan Alternative and the Final Plan Variant, large four-bedroom units remaining in these neighborhoods would be divided into smaller units, to accommodate more, smaller households. Some of the

buildings were historically divided into two-bedroom units, and thus would be returned to their original configuration. This strategy, combined with the planned removal of Wherry Housing, would result in a substantial decrease in housing and in population in the South Hills planning district – from 587 housing units today, to 176 housing units in 2020 (Final Plan Variant) or 2030 (Final Plan Alternative). This reduction clearly belies the suggestion that subdivision would "increase the residential population and subsequent environmental impacts."

The alternatives that propose removal of all or a portion of the East and West Washington neighborhoods would do so to expand open space, increase habitat, and increase habitat connectivity. In response to comments, maps provided in the Alternatives Section of the EIS have been modified to illustrate that the portion of West Washington that would be removed west of Battery Caufield Road would be restored to support native plant communities. In this area, the topography and soils could support lessingia populations, and possibly quail habitat.

Where houses are proposed for removal in the East Washington area, landscaped vegetation would be the result, and could provide habitat for common plant and animal species, or could be used for recreational purposes. The proposals to restore native habitat, including serpentine grassland habitat where the soil substrate would support this plant community, or historic forest, are noted, and may inform future implementation decisions. Additional data collection and survey efforts would be required to help guide future long-term planning restoration priorities for serpentine communities and associated special status species recovery. The Trust will conduct studies in this region to better inform building demolition decision-making efforts. During 2001, the Trust and NPS worked in partnership with San Francisco State University to refine soils maps within the Inspiration Point area, and it is anticipated that future mapping efforts would be built on this partnership.

Where housing remains in the East and West Washington neighborhoods, the potential for removal could be further considered when the buildings near the end of their "useful life," after the current planning horizon. As stated in the Final Plan, the Trust will pursue landscape treatments utilizing native plants, and take other steps to increase the scenic, recreational, and habitat values of the neighborhood. The Trust will also study potential traffic controls along Washington Boulevard. In all instances, roadway or trail access will be maintained, and any major changes in circulation (e.g., permanent road closures) will be subject to environmental analysis and public input pursuant to NEPA.

The houses proposed for removal along East Washington Boulevard were previously analyzed to assess their historic and architectural significance, and to determine their eligibility for inclusion in the National Register of Historic Places and/or their consideration for "contributory" status in the NHLD. Buildings 401 to 424 and Buildings 428, 432 and 434, known as East Washington Housing or Capehart Officer Family Housing, were constructed in 1948 and are listed as non-contributing resources in the 1993 NHL District Documentation.

Since 1993, two studies reassessed the East Washington Housing area and found it was not eligible for the National Register of Historic Places. The U.S. Army Environmental Center completed a comprehensive contextual study of these units in "For Want of a Home…," A Historic Context for Wherry and Capehart Military Family Housing. This study states "based upon the research conducted and evaluation of Wherry and Capehart housing in accordance with the National Register Criteria, it is recommended that these buildings are not eligible at a national level of significance, for the National Register of Historic Places... Using this historic context, an evaluation of local- or state-level significance may be conducted on a case-by-case basis in accordance with the National Register Criteria for Evaluation, however, it is believed that Wherry and Capehart housing will rarely meet this standard" (pages 96, 97). Furthermore, in 2001, all properties at the Presidio constructed after World War II were evaluated for historic significance as part of the Doyle Drive project. Steve Mikesell, acting as a consultant to Caltrans, evaluated the East Washington houses as part of this effort, looking at their potential significance in the context of the Cold War era. Neither the East Washington houses, or any other post-war structures at the Presidio were determined to have any significance for this time period. The Federal Highways Administration, the lead agency on the Doyle Drive project, has submitted this survey and evaluation report to the State Historic Preservation Officer for concurrence.

The above evaluations, completed by two separate agencies other than the Trust suggest there is no evidence for considering East Washington Housing or any other non-historic housing proposed for removal as historically or culturally significant.

HO-14. ***MacArthur/Tennessee Hollow***

Several commentors voice support for demolition of non-historic housing along Quarry and McArthur Streets to permit restoration of the Tennessee Hollow stream corridor. "The demolition of MacArthur and buildings related to Tennessee Hollow restoration should be completed no later than 2020" to eliminate "the fragmentation of the biology" of the area. ("Non-historic housing should be removed for ecological restoration.")

Response HO-14 – All EIS alternatives except for the Minimum Management Alternative would include the demolition of non-historic housing along McArthur Avenue, as well as demolition of a few residential structures on Quarry and Morton streets. The Resource Consolidation Alternative would eliminate additional housing along Quarry Street while the Final Plan Variant would eliminate additional housing along Morton Street. All demolitions would facilitate restoration of the Tennessee Hollow riparian area, although no specific time frame is identified. As discussed in relation to Wherry Housing, above, removal of housing cannot be undertaken until financially feasible. In other words, the housing cannot be removed until funds are available for demolition and habitat restoration, and until the resulting loss in rental income can be sustained without jeopardizing preservation and operation of the park. The timing of removal in relationship to creation of replacement housing is addressed in Response HO-8, above.

HO-15. ***Fort Scott***

One commentor suggests retaining non-historic housing at North Fort Scott, and sub-dividing those units to create a maximum number of low-cost rental units, sized to meet Presidio employee demand. The same commentor indicates that there is "no need" to use any of the buildings surrounding the Fort Scott parade ground for residential uses.

Response HO-15 – As described in Response HO-9, above, the Trust acknowledges that subdividing existing units is often an efficient way to replace housing that is removed to expand open space or meet other Plan goals. The precise number of units that can be achieved in this way has not been determined, and only one preliminary study of a subset of Presidio buildings has been completed. This study looked at the potential for dividing units in ten buildings within North Fort Scott and concluded that they were highly suitable for subdivision. If this conclusion were to be borne out for all buildings in North Fort Scott after further physical investigation, and after calculating both the costs and the time required to amortize those costs based on expected rents, the existing 42 units could become 84 units.

The architecture and location of North Fort Scott also make it a possible site for demolition and reconstruction of housing. Existing units are within unattractive, non-historic buildings, disbursed along a winding roadway and cul-de-sac. The site is also accessible to transit connections at the Golden Gate Bridge plaza, yet visually secluded from the rest of the park. A preliminary analysis estimated that this site could accommodate 100 to 150 dwelling units if existing buildings were removed and replaced with buildings more compatible to their wooded setting and their presence within an NHLD. The analysis conducted by SMWM, the North Fort Scott Housing Capacity Study (January 2002), is incorporated here by reference and available in the Presidio Trust library for review.

Because further studies of this site and the economics of subdivision versus new construction are required, the Final Plan does not specify which strategy will be undertaken for increasing the density of housing at North Fort Scott. See the Housing map in Chapter Two of the Final Plan. Similarly, the Final Plan does not determine whether the 159 residential accommodations in the barracks that ring the parade ground at Fort Scott will remain as housing, or be converted to non-residential use. The ultimate use will be determined through further study, and as other uses are identified for Fort Scott. If an educational institution is found to occupy a portion of the buildings, it is possible that the barracks could provide student, faculty, or employee housing, or could provide more transient accommodations (i.e., lodging) as originally proposed in the 1994 GMPA and analyzed in the No Action Alternative (GMPA 2000).

HO-16. ***Housing Plan***

A number of commentors request more specificity regarding housing in the form of a building-specific, park-wide plan. ("The GMPA called for developing such a plan and the Trust has not shown why an overall housing plan would not be required.") The CCSF Planning Department states "A Housing Management Plan should be included in the PTIP, and should be the focus of ongoing coordination with the City's Planning Department and the Mayor's Office of Housing." Some commentors suggest that the Trust should make no decisions on construction and demolition prior to completion of the housing plan.

Response HO-16 – It is unclear precisely why the GMPA EIS called for development of an "overall housing management plan" to "guide the housing program," except as a way to allocate housing to NPS employees. That EIS also called for monitoring the "jobs-housing balance" over time, and considering "the conversion or adaptive rehabilitation of structures for residential use," despite the apparent inconsistency of this strategy with NPS policy. As stated in the 1994 GMPA EIS (Responses to Comments, pages 73 and 121), "Park Service policies generally limit housing within park boundaries." "Federal policy does not allow all Park Service employees to have access to park housing. It is allocated to required occupants such as public safety officers, maintenance workers, managers, and seasonal or temporary employees. Park housing is considered an additional benefit unavailable to other public servants, and therefore controlled for equity purposes." Also "Presidio housing would be made available to any National Park Service employee based at the Presidio, following an allocation system outlined in the Housing Management Plan."

In response to comments on the Draft Plan, the Final Plan has been modified to include further specificity with regard to housing. Chapter Two of the Final Plan indicates the number of residential accommodations (conventional dwelling units and barracks or dormitory units) in each planning district, the number proposed for removal and replacement, and the number proposed at the end of the planning horizon. In most cases, numbers which depend on future implementation decisions are presented as a range; in these cases, the final numbers will be determined as a result of further, area-specific and building-specific investigations. Ranges are consistent with the Residential Program assumptions presented in Attachment B to Appendix J in the Draft EIS. This attachment has been updated and clarified in the Final EIS.

The Final Plan also places constraints on the maximum number of dwelling units in each planning district, the maximum Presidio-wide, and the maximum that would be achieved through new construction. Qualitative and procedural constraints would also apply to any new construction.

With these changes, the Final Plan provides sufficient policy direction regarding housing to obviate the need for further Presidio-wide planning on this issue. Those seeking a detailed assignment for individual buildings (e.g., for retention, demolition, or subdivision) can be assured that those decisions will be consistent with the Plan's policies and will fall within the range of units (and therefore impacts) identified. Implementation decisions not specified in the Final Plan will be made in the future, following additional analysis of physical and fiscal considerations. Should potential impacts vary from those described in the EIS, or should new construction be proposed, additional analysis, public input, and agency consultation would be undertaken, consistent with NEPA and the NHPA.

The Presidio has historically been and remains a federal property distinct from the governance of the City and County of San Francisco, and one that has provided a substantial amount of workforce housing. Thus, while the Trust embraces the notion of communication and cordial relations with the City, no more formal relationship or oversight would be appropriate.

HO-17. ***Impact of Housing Decisions***

The CCSF Planning Department indicates that "it is not clear" how the "very aggressive jobs-housing balance goal" articulated in the Draft Plan will be achieved, particularly in light of the planned demolition of existing housing. The CCSF Planning Department asks what impacts demolition and replacement of housing will have on the affordability of housing, and on Trust expenses and income. They recommend that this analysis be presented in the EIS.

Response HO-17 – The jobs-housing balance goal referred to is the suggestion that Presidio housing will be provided to accommodate 100 percent of the housing demand created by Presidio-based employees who want to live at the Presidio. This adjusted demand for housing is based on the understanding that many factors – not just the location of a job – determine where individuals choose to live. The Sedway Group's Housing Demand Analysis cited earlier indicates that this demand could be accommodated within the existing number of units, or within the number proposed in the alternatives that call for replacement of all or most of the removed housing.

As described in Response HO-9 above, removal of housing and replacement within existing buildings will mean that the average unit size at the Presidio will decline, and in this sense, housing units may become more affordable. Conversely, when existing housing is removed and replaced with similar-sized units, that housing will be generally less affordable because the cost of demolition and replacement must be amortized, necessitating relatively higher rents. Also, newer units contain modern amenities and tend to command higher rents simply because they are more desirable. Nonetheless, the Trust has committed to maintaining a diversity of housing types and accommodating a diversity of residents. The Preferred Renter Program and other housing programs will be monitored over time and adjusted as necessary to achieve the desired diversity. Also see Responses HO-4 and HO-5 regarding affordability and who benefits from Presidio housing.

Potential impacts on Trust expenses and income are presented within Appendix K of the Final EIS.

HO-18. ***Incentives for Shared Housing***

Many commentors have suggestions regarding incentives that could be offered to encourage use of housing by Presidio-based employees. A couple suggest that the Trust provide a 10 to 20 percent discount for households with multiple Presidio employees to promote shared housing, thereby help to accommodate the demand for housing units, efficiently using existing housing, and reducing the need for new housing construction.

Response HO-18 – Full-time Presidio employees already have first preference for housing and the recently revised Presidio Preferred Rental Program provides average rent discounts of more than 30 percent for participating households. Moreover, the Preferred Rental Program makes sure that housing discounts are provided to people who need them the most (i.e., households whose earnings do not exceed the area median income). Employees could voluntarily double up to participate in the Preferred Rental Program and increase the number of Presidio-based employees, but whether or not one wants to change one's household composition to achieve a social end is a personal choice.

See Responses HO-4 and HO-5 regarding affordability and who benefits from Presidio housing for discussion of other incentive suggestions, including financial subsidies and set-asides of affordable units.

HO-19. ***PHSH Questions and Suggestions***

The Sierra Club asks the Trust to clarify how the Draft Plan can take the 180 Public Health Service SRO units and allocate the square footage to residential (see Appendix J Land Use table) from the total group housing room of 540 and still have 410 SRO units (rather than the 360 balance) available in their model for group housing. They suggest that the Trust should adopt the Sierra Club's proposal for how to configure SRO facilities. This would include 180 rooms at the historic portion of the Public Health Service Hospital for employee family residential use that would be converted into a lesser number of studio and one-bedroom units, estimated at over 100. It would also include removing all SRO units at the Fort Scott parade ground. These changes would eliminate 200 rooms from the SRO unit housing total.

Response HO-19 –The PHSH is a non-residential building, and therefore does not contribute to the 538 group quarters described as part of the existing setting. While the Draft Plan assumed some portion of the PHSH building would be converted to residential use, the Final Plan has embraced this assumption as a specific "preference" in response to public comment. Thus, under the Final Plan, the PHSH would be rehabilitated for use as housing, and would provide an estimated 80 to 200 units. It has not been determined whether these units would be "SRO-type" units or conventionally dwelling units. This decision, and the actual number of units that could be provided, will take further site-specific analysis, including a detailed assessment of the historic building and rehabilitation requirements.

HO-20. ***The No Action Alternative (GMPA 2000)***

The Sierra Club also suggests that the No Action Alternative (GMPA 2000) in the EIS distorts the 1994 GMPA with regard to housing, and should be corrected. Suggested revisions include the number of units possible through conversion of existing buildings, the overall number of single-family units, and the number of SRO-type units. According to the Sierra Club, the supply of single family units shown in the EIS for the GMPA 2000 alternative is understated, and the Trust should explain why the GMPA 2000 alternative shows 270 SRO units rather than the 540 SRO units presented in the 1994 GMPA. They further suggest the GMPA 2000 alternative should be adjusted to reflect the same conversion shown for the Draft Plan alternative, both for family units and dorms. Based on these revisions the GMPA 2000 alternative would include 560 family units from rehab, 80 units from conversion, 280 units from subdivisions, 0 units from new construction, and 410 single dorm units for a total of 1,320 units.

Response HO-20 – Under the 1994 GMPA, the Presidio's housing stock would be reduced substantially by 2010; the Presidio would contain 506 dwelling units with 1,613 residents, and 384 dormitory beds with 384 occupants (GMPA EIS, page 160). The total residential population would be about 2,000 (with additional units and dormitory beds made available as lodging for up to about 720 guests). The No Action Alternative (GMPA 2000) contains 510 dwelling units with 1,260 residents, and 260 dormitory units, with 400 occupants, or a total residential population of 1,660.

Thus, the main differences between the No Action Alternative (GMPA 2000) and the 1994 GMPA are: (1) the number of residents assumed per dwelling unit and (2) the use of dormitory units as a descriptor, rather than dormitory beds. The NPS used a population density of 3.2 residents per unit, the derivation of which is unclear from the text of the EIS, and the Trust analysis uses a density of 2.5 residents per unit, which was based on a review of residential leasing data prior to preparation of the Draft EIS. The NPS chose to count dormitory beds for their analysis. The Trust chose to count units, assuming that many dormitory units actually contain more than one bed, which is the way many group quarters are configured at the Presidio (for example, the units in Building 42).

Despite the unit counts presented in the 1994 GMPA, analyzed in the associated EIS, and explained here, the commentor suggests that the No Action Alternative (GMPA 2000) be modified to include more housing as a result of subdividing large units and converting non-residential space to residential use. This suggestion is apparently based on speculation about the outcome of a mitigation measure in the GMPA EIS requiring the NPS to monitor the jobs-housing balance and "consider" the "conversion or adaptive rehabilitation of structures for residential use" if "additional housing for park and park partner staff was required." Though the suggestion is noted, and a variation on the Draft Plan Alternative that substantively complies with this request is provided in the Final EIS, the No Action Alternative (GMPA 2000) has not been amended. This is because the No Action Alternative (GMPA 2000) was designed – and then refined at the request of comments received in the scoping period – to deviate from the 1994 GMPA as little as possible in order to provide a meaningful "no action" scenario for comparison to other alternatives.

HO-21. ***Leasing***

One commentor suggests that the Final Plan clearly spell out what protections residential tenants have, to reduce vacancy and turnover rates.

Response HO-21 – The PTMP is a policy document, and beyond identifying overarching goals (e.g., accommodate housing demand associated with Presidio-based employees; maintain affordability; ensure a diversity of tenants), it does not delve into real estate management issues. The commentor may request information from the Trust's residential management firm, John Stewart Company, including information regarding standard lease provisions, and information regarding the potential for leases extending beyond a one-year term.

HO-22. ***Population & Employment***

Several commentors address the issues of population and employment, with one suggesting that the EIS include a Trust policy statement that defines the desired human population density for each of the seven planning districts. ("While much DEIS print has been invested to describe the attention required for endangered species, archaeological remains, and Tennessee Hollow

restoration objectives or building reuse objectives, I am less clear as to what the ultimate park density should ideally be for humans circulating and living in each planning district. How can the DEIS alternatives be fully evaluated without knowing how many humans the Presidio landscape could accommodate as visitors, employees, residents?") Another commentor suggests that the EIS make clear that the change in on-base residents from the 1990 Census to 2005 will essentially be zero and may actually decrease. Some commentors ask that the Trust "cap" employment and housing at modest levels, suggesting that this would be consistent with the Presidio's status as part of the National Park System and as an NHLD.

Response HO-22 – The EIS addresses the issues of population and employment, providing an estimate of the number of park-wide residents, visitors, and employees under each alternative. Disaggregation of park-wide totals into the planning districts is inherent in the traffic assignments used to analyze potential transportation impacts, but is not reported in the body of the EIS or appendices because of its limited relevance to other aspects of the analysis.

The number of employees is provided in Table 1 in Appendix D of the Draft EIS, is used in the housing demand calculations, and is derived by dividing the square footage of each land use by its employee density (square feet per employee). The number of residents is provided in Table 42 (Draft EIS, page 303), and is derived by multiplying the number of units by a factor for average household size (2.5) and by the average number of residents per dorm unit (1.5). The number of visitors is provided within the text discussion of impacts on the visitor experience. Visitorship projections have been refined in the Final EIS as described in Response VE-1. These data are provided below, with comparison to 1990 Census data

Summary of Residents, Employees, and Visitors for All Alternatives

Alternatives	Total Residents	Total Employees	Recreational Visitors (annually in millions)
1990 Census	4,700	5,550	(not applicable)
No Action Alternative (GMPA 2000)	1,660	6,460	5.2
Final Plan Alternative	3,770	6,890	7.2
Final Plan Variant	2,630	6,630	5.9
Resource Consolidation Alternative	2,230	8,480	7.0
Sustainable Community Alternative	3,330	7,520	8.2
Cultural Destination Alternative	3,990	7,840	7.2
Minimum Management Alternative	3,600	7,820	6.5
Sources: 1990 U.S. Census, The Presidio Trust, Sedway Group, Bay Area Economics, Wilbur Smith Associates, 2001 and 2002. All figures are rounded			

Assessing how much density any given area can accommodate is a difficult task, particularly because residents, employees, and visitors tend to use the park at different times, and the groups can overlap substantially (for example, if residents also work in the park, and also visit destinations such as Crissy Field or Inspiration Point). Nonetheless, the EIS analysis in its entirety essentially analyzes the potential impacts associated with a de facto "cap" on the number of residents and employees under each alternative. This "cap" is established by the amount of residential and non-residential space that would be available for leasing under each alternative, using reasonable factors to estimate employment densities and residents per household. In each case, the "cap" does not account for residents who may also be employees, and does not establish a firm limit on household size or employment density.

Regarding visitors, the Trust has committed to monitor visitor levels, establishing "carrying capacities" for managing visitor use if necessary. See Mitigation Measures CO-6 and CO-8 in the Final EIS.

4.19 LODGING (LO)

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PARK-WIDE LODGING PLAN

LO-1. *Define the Lodging Plan*

Several commentors, including the San Francisco Planning and Urban Research Association, suggest a park-wide lodging plan that identifies specific planning districts where lodging would be located or precluded, describes the type of lodging on a building specific basis, and identifies whether or where new hotels or lodging would be constructed. Several commentors request that the lodging plan specifically identify where the lodging would occur, how many square feet would be found in each building, the maximum square footage, limits on the number of rooms and or facilities, the anticipated demand, and the priorities for types of lodging in the Plan. One individual asks: "How many overnight guests does the Trust's preferred plan accommodate? How many rooms will be provided for overnight use? What is the maximum conference capacity permitted under the Trust's preferred plan?" Another individual states "The Draft Plan allows for a host of 'lodging' uses, but neither the Draft PTIP nor the EIS makes any mention of the number, size, or price range of these lodgings, nor of the number of overnight guests the Trust intends to accommodate. It is also unclear how the trust intends to use former dorm/barracks/SRO rooms – will they be housing, lodging, or something in between (and how many will be assigned to each category of use)?" Some commentors specifically recommend inclusion of an inn or hotel.

Response LO-1 – The Final Plan provides overall management policies for the Presidio, including principles governing the care and management of varied resources, preferred land uses, and programs and activities that are appropriate in this national park setting. An important component of the PTMP is the inclusion of visitor-serving uses, including cultural and educational uses, as well as lodging needed to support such activities at the Presidio.

In response to public comments, the Final Plan has been revised to provide more clarity about lodging and where it may occur. As indicated in Chapter Two of the Final Plan, lodging will occur primarily in historic buildings, and is a preferred use in the Main Post, Crissy Field, and Fort Scott planning districts. The Plan calls for a variety of accommodations, such as bed and breakfasts, dormitory style inns or hostels, as well as small hotels. Overall, the amount of lodging is estimated at approximately 200,000 to 290,000 square feet or 180 to 250 rooms of varying sizes. Preferred locations include Pershing Hall at the Main Post, Stilwell Hall at Crissy Field, and Scott Hall at Fort Scott. All three are historic buildings and would afford the visitor an opportunity to experience the Presidio in a way that lodging in other parts of San Francisco would not. New construction may be pursued in the form of building additions or annexes to make rehabilitation and reuse of the buildings

functionally and financially feasible. The PTMP provides sufficient detail and serves as the lodging plan urged by commentors. The above specificity has been incorporated into the Final Plan's description of lodging. Also see Response TP-1.

Additional details regarding the specific locations, size and design of lodging facilities are beyond the scope of the current planning effort and will be determined as the feasibility of individual proposals is assessed. Any lodging that is undertaken will be consistent with the provisions of the PTMP including the planning guidelines provided in Chapter Three, which will ensure that uses and structures are compatible with the historic and natural resources of the Presidio.

LO-2. ***Appropriateness of New Lodging***

Some commentors feel that there should be no lodging facilities at the Presidio. The Pacific Heights Residents Association states "PHRA strongly rejects the idea presented in the Draft alternative of building a new lodge anywhere in the Presidio." Other commentors state that unless the Presidio is to become an entertainment center for tourists, lodging is unnecessary. The NRDC writes, "We oppose construction of a hotel or other large scale tourist lodging at the Presidio. New lodging facilities are not needed (there is ample space outside the park), will increase traffic within and outside of the park (since tourists will visit other places as well) and will contribute only insignificantly to income. This new construction is inconsistent with the Trust's goals of reducing development at the Presidio and enhancing the natural environment, and will definitely have an impact on the Presidio's historic and cultural fabric." Some commentors state that there should be no hotels at Crissy Field or the Main Post. The Planning Association for the Richmond states, "We oppose the creation of hotels or other large-scale general tourist lodging on the Presidio." Many commentors express a preference for campgrounds instead of hotel-type lodging, and several commentors assert that lodging in national parks is inappropriate. The GGNRA Citizens' Advisory Commission states "Conference and associated lodging facilities should be encouraged where the mission fits the Presidio themes and maximum reuse of historic structures is included.

Response LO-2 – Lodging has historically been a feature of our national parks, including many parks that do not contain an extensive, historic built environment like the Presidio. As a military base, temporary lodging has been a component of the Presidio, along with residential development, as shown by the numerous barracks and homes. Lodging is an appropriate reuse for some of these historic structures, and has long been part of planning for the Presidio's reuse. The 1994 GMPA adopted by the NPS called for 96 dwellings to be used as "guest quarters," and also stated that "Barracks and dormitories would be reused as lodging for the conference facility" as well as other uses, with 554 beds "reserved for visitor or guest use" (Final EIS, page 172).

In proposing lodging, the PTMP does not depart from either the historic context, or the plan context established by the GMPA. Rather, the Final Plan proposes to provide an experience for visitors unlike any they are likely to get at nearby hotels and motels.

Lodging facilities that are destinations in themselves are not proposed. Instead, small-scale lodging is envisioned as a service for visitors involved in activities at the Presidio, and as a way for visitors to fully experience the historic ambience and natural beauty of the Presidio. Also see Response LO-5.

LO-3. ***Type and Location of Lodging***

Many commentors express views pertaining to the type and amount of lodging and related facilities such as conference centers and dining areas. Some commentors believe that lodging should be constructed only in specific areas. Commentors request that lodging not be allowed in areas where there are natural resources or that the overall number of lodging facilities should be minimized. For example, the Neighborhood Association for Presidio Planning states that "NAPP strongly opposes building any new lodging in the Presidio, particularly in the Crissy Field or Main Post areas." Commentors request that the need for lodging be demonstrated and existing buildings suitable for lodging identified and set aside. One commentor requests that the Trust justify any lodging accommodations in Area B of Crissy Field. Other commentors recommend a variety of specific types of lodging facilities such as high income bed and breakfasts, lodging that is more affordable, lodging without any high-rises, youth hostels, elder hostels, bed and breakfasts, hotels,

holiday cottages, and lodging that caters to corporate groups. Other commentors indicate that conference centers or places to hold business conferences would be a good use within the park. San Francisco Beautiful expresses concern that "Planning Principle 12 is too broad. Lodging may be an appropriate use to preserve historic buildings, or as part of a program (such as at Fort Scott). General lodging is usually discouraged in national parks, and is particularly questionable in a national park surrounded by an urban area with tens of thousands of rooms for rent. The type of lodging, and its scale, should be limited." Urban Watershed states that "lodging should remain small-scale bed and breakfast operations supporting conference visitors. Large-scale hotel operations are not desirable, will increase traffic to and from the Presidio and intrude on the mission of the Presidio."

Response LO-3 – As discussed in Chapter Two of the Final Plan, only a limited amount of lodging is proposed. Its principal purpose will be to support the visitor-oriented uses of the Presidio, including educational and cultural activities. As suggested by the commentors, the Plan envisions a variety of accommodations, from bed and breakfasts, to hostels, to small inns or hotels.

As described in Chapter Two of the Final Plan, the total number of rooms that would be provided is estimated at 180 to 250, and these would be located in historic buildings or in additions or annexes required to facilitate the reuse of historic buildings. All lodging will be located within existing developed areas, and not in natural areas. In response to public comments, the Final Plan identifies some buildings that are considered likely candidates for lodging, such as Pershing Hall at the Main Post, Scott Hall at Fort Scott and Stilwell Hall at Crissy Field (Area B). These buildings have been identified for lodging use because of their location in proximity to current and planned visitor-services uses, and because they are physically suited to reuse as lodging. The feasibility of lodging in these buildings or in other buildings will be determined through more detailed, site-specific analysis. Lodging is proposed in the Main Post, Area B of Crissy Field and Fort Scott planning districts because they are already built environments, will support cultural and educational activities, the existing buildings lend themselves to conversion to lodging facilities, and human occupation (primarily residential) was a historic use. Conference facilities are envisioned as accessory to lodging facilities and as a continuation of current activities at the Golden Gate Club, Officers' Club, Log Cabin, and other meeting spaces. No large-scale conference center along the lines proposed by the NPS at Fort Baker is currently proposed.

With regard to potential traffic generated from lodging facilities, to put this issue in perspective, the proposed lodging rooms in the Main Post/Crissy Field districts are expected to generate less than 600 daily vehicle trips. Furthermore, trips to and from lodging uses are not concentrated during a.m. and p.m. commute periods. Only six percent of these trips would occur in the a.m. peak hour and eight percent would occur in the p.m. peak hour.

LO-4. ***Lodging Should Have Themes***

Commentors state that the Trust should adopt and implement design guidelines that incorporate both historic and environmental themes and that priority should be given to lodging providers who use the NPS Guiding Principles for Sustainable Design. One business suggests that while military themes are appropriate and attractive, the Trust should also incorporate both historic and environmental themes to truly achieve models of sustainable tourism. The GGNRA Advisory Commission states "Conference and associated lodging facilities should be encouraged where the mission fits the Presidio themes and maximum reuse of historic structures is included. Bed and breakfast, youth and elder hostel facilities that serve people utilizing and visiting Presidio facilities would be appropriate."

Response LO-4 – As discussed in Response LO-3 above, lodging at the Presidio is intended to support visitor-serving uses, including cultural and educational uses, and to allow visitors to better understand the Presidio's resources. All building uses and any physical changes proposed will be assessed for conformance with the PTMP and the planning principles and planning guidelines it contains. These planning principles include preservation, protection and enhancement of the natural, cultural and recreational resources of the Presidio and also encompass the principle of sustainability. Tenant selection criteria are included in Chapter Four of the Final Plan, and will be used to evaluate lodging proposals. The NPS Guiding Principles for Sustainable Design are not one of the selection criteria per se, but compliance therewith could demonstrate adherence to other criteria s uch as the user's ability to rehabilitate and reuse historic buildings, or contribute to

the visitor experience. Chapter Two of the Final Plan describes the Trust's commitment to sustainable building design and rehabilitation, including adoption of the Leadership in Energy Efficient Design Green Building standard developed by the U.S. Green Building Council.

Chapter Three of the Final Plan contains planning guidelines to ensure that all development is compatible with the historic, natural and recreational resources of the Presidio. Sensitivity to historic uses and context, and consistency with the Secretary of Interior Standards for Rehabilitation of Historic Properties will be paramount.

PROVIDE LODGING IN EXISTING BUILDINGS

LO-5. *Use Existing Buildings*

A number of commentors suggest that the Trust use the existing buildings on the Presidio to provide lodging so as to preserve the historic character and fit with the historic and/or environmental themes of the park. Some of the uses proposed for the existing buildings include bed and breakfasts, youth and elder hostels, or renting out the buildings as historic houses for vacations. One commentor specifically states "Lodging for visitors should be limited to historic buildings, with new construction permitted only for ancillary functions."

Response LO-5 – The Final Plan is in agreement with the commentors. Lodging facilities will be provided in existing buildings, primarily historic buildings. The only new construction for lodging would consist of additions or annexes necessary to enable an existing structure to function as a lodging facility.

CLARIFY LODGING RELATED ASPECTS OF THE PLAN

LO-6. *Disclose More Information about Lodging*

Several commentors ask that the Trust clarify the lodging related aspects of the Plan by indicating the number of buildings, size of the buildings, number of guests accommodated, rooms for overnight use, capacity of the buildings, and price range of the facilities.

Response LO-6 – The Final Plan estimates the number of rooms (180 to 250 rooms), extent (200,000 to 290,000 square feet), location (Main Post, Area B of Crissy Field, and Fort Scott) and type (e.g., bed and breakfasts, small inns, hostels) of lodging that would occur under the PTMP. The PTMP is a programmatic plan that provides overall direction regarding land uses and physical changes over time, and calls for diversity of overnight accommodations, serving a range of visitors. The feasibility of reusing specific buildings as lodging will not be determined until later site-specific studies, which will include analysis of size and pricing. Nonetheless, the Plan identifies Stilwell Hall at Crissy Field and Pershing Hall at the Main Post as preferred buildings for lodging.

LO-7. *Hotel at Crissy Field*

Several commentors ask the Trust whether the PTMP calls for a hotel to be built at Crissy Field and if so, what would be the size of the structure. Several commentors state that no hotel facilities should be developed at Crissy Field.

Response LO-7 – Stilwell Hall has been identified as the preferred location for a hotel at Crissy Field, either alone or in combination with adjacent buildings. Stilwell Hall would be appropriate for conversion to a hotel because of its former use as a barracks, although an addition or annex may be necessary to convert the building to lodging for visitors. The financial feasibility has not been determined, and the Plan's stated "preference" can not be viewed as a proposal. No hotel developer or operator has been selected, nor has one been solicited for the site. A site-specific assessment of Stilwell Hall's feasibility for use as lodging will follow the PTMP planning process. Any new construction proposed as part of the project will be governed by the planning guidelines in Chapter Three of the PTMP, which will ensure compatibility with the scale and design of the existing building, and will require further public input as described in Chapter Four of the Plan. An illustrative rendering of Stilwell Hall with a possible annex building is shown in Chapter Three of the Final Plan.

LO-8. *Distinguish Between Lodging and Housing*

An individual asks the Trust to distinguish between lodging and housing.

Response LO-8 – The PTMP distinguishes lodging as short-term accommodations for visitors, while housing is for longer term residents of the Presidio. The Final EIS analysis assumes a specific amount of each type of land use, and the preferred locations of these uses are identified within the Final Plan. In some cases, the PTMP allows flexibility in the designation of lodging and housing uses, because the most appropriate uses for some buildings and areas have not been determined. For example, the barracks buildings surrounding the parade ground at Fort Scott are called out as housing in the PTMP. If needed to serve educational uses of Fort Scott, the barracks could be developed either as student housing or as lodging. (They were designated for lodging in the 1994 GMPA.) The ultimate use of the barracks will be determined in the future, as the other uses of Fort Scott are determined, and as a cost-effective means of ensuring their rehabilitation and reuse is identified.

VISITOR SERVICES

LO-9. ***Competition with Other Uses***

The Evelyn and Walter Haas Jr. Fund states "We hope the Trust will work to ensure that its final plans for visitor services also enhance and not compete with existing and planned services at Crissy Field . . ."

Response LO-9 – Uses at Area B of Crissy Field are intended to complement those provided in Area A. Small-scale lodging and other land uses would support the educational, cultural and recreational offerings at Crissy Field. In response to the commentor's concerns about the level of visitor services within Crissy Field (Area B), the Final Plan reallocates planned uses by moving approximately 55,000 square feet of new construction to the Letterman Complex, and clarifies the qualitative and procedural constraints that would apply to any new construction.

LO-10. ***Future Retail Services***

Telegraph Hill Dwellers want the Trust to restrict retail services to existing buildings and to serve the immediate needs of on-site visitors and residents only. Telegraph Hill Dwellers state "Any retail should be restricted to enhancing the visitors visit to the Presidio, like the Warming Hut on Crissy. Avoid trinket and tourist schlock and places that are a destination for local citizens." The Richmond District Democratic Club notes that a "few necessary commercial services" should be available not only for convenience of tenants, but to reduce automobile traffic in the park and to generate rental revenue for the Trust.

Response LO-10 – The Trust agrees, the focus of proposed retail uses in the Final Plan is as a community and visitor service. The Trust expects a limited amount of service retail, like the Warming Hut (located at Crissy Field – Area A), targeted at park visitors, residents, and employees. These uses would primarily be located in existing buildings. The exact nature of products made available will be determined as the specific uses are identified, but "destination" retail centers are not proposed.

4.20 PROGRAMS (PR)

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PROGRAM DELIVERY

PR-1. *Rationale for Trust's Role in Program Delivery*

Many commentors request that the Trust provide a clear, easily understood explanation of changes proposed in the Draft Plan's program delivery system and funding mechanism for park programs in so far as they differ from the GMPA concept. The NRDC letter notes that the only rationale that has been provided for this change is that it is based on experience and financial projections, hardly a clear rationale for the public to evaluate. Another commentor asks where the enabling legislation gives the Trust the authority to take on programming. Commentors are divided on whether the Trust acting as program provider would be an improvement over the GMPA. The California Native Plant Society characterizes the Trust as having "little call" to establish new programming. ("To do so risks diversion from its central competence, in a city and region overflowing with successful, competing program providers.") The Lake Street Residents Association questions whether it makes sense for the Trust to be program provider to the public. The Tides Foundation suggests that this would be a new role for the Trust, "not necessarily contemplated either legislatively or otherwise, for which it is poorly suited and inadequately staffed." One individual asserts that this "'top-down' process of programming, especially without any suggestion of how programming decisions will be made, is a recipe for disaster and embarrassment." The same individual wonders "what programming skills do the Board and staff of the Trust bring to the table, besides Mr. Heyman's work with the Smithsonian?" The NPS notes that "if the Trust relies only on agency generated programs and sources, the programs provided could lack the diversity envisioned in the GMPA." California Lawyers for the Arts notes that Trust programming would risk "homogeneity and conservatism in approach" and "to be vibrant, arts need to be experiential and arise from the community rather than being directed by a quasi-federal agency."

Other commentors had a different perspective. One of these commentors registers its "wholehearted support" for Trust programming because "it very ably balances the many interests of all segments of Bay Area society." The Fort Point and Presidio Historical Association states that the Trust's commitment to "providing high-quality, accessible historical and other cultural programs is a significant improvement over the GMPA." San Francisco Beautiful believes that the Trust "as the manager and director of program quality and implementation is the appropriate body to meet the overall program goals." ("Quality is especially important in a national park with millions of national and international visitors.") The advantages of program consistency and coordination "make sense" to the CCSF Planning Department; however, it notes that "if an emphasis on 'the bottom line' is to become increasingly prevalent, then the Trust must compensate by selecting programs that are economically and socially diverse." SPUR commends the Trust "for taking the lead on this, rather than relying on its tenants for programming consistency and quality." Other groups, such as the Cow Hollow Association, concur that some augmentation of park programming is necessary; however, this should be "commensurate with the Presidio's national charter and the vision of the GMPA…"

Response PR-1 – The 1994 GMPA assumed that tenants would be chosen in conformance to four programmatic themes: stewardship and sustainability, cross-cultural and international cooperation, community service and restoration, and health and scientific discovery. These themes supported an overarching vision of the park as a "global center dedicated to addressing the world's most critical environmental, social, and cultural challenges." Under this scenario, tenants would be a source of public programming as well as a source of revenue for the park. This approach is assumed as part of the No Action Alternative (GMPA 2000) analyzed in the PTMP EIS.

In contrast to this approach, the Draft Plan, as well as the Final Plan, provides that not every Presidio tenant would be required to have a mission that serves a specific program theme. The Final Plan Alternative does not preclude the possibility of tenants providing programs that are related to the park, as well as programs that are specific to their own purpose. However, park tenants would not be the sole provider of Presidio programs.

The Trust proposes, in the Final Plan, to be more responsive to the market in its selection of tenants than the GMPA assumed. The Final Plan allows the pool of potential tenants to remain wide, and does not restrict tenants to the GMPA's four program themes. The Plan, therefore, puts less emphasis on who occupies buildings, and more on the preservation of park resources to ensure that visitors have an exceptional experience. This approach, expressed in the Final Plan, could allow greater tenant diversity than envisioned in the GMPA.

Under the PTMP, the Trust will not choose tenants principally for their programmatic capacity. Rather, the Final Plan states that tenants would be selected on the basis of the following criteria: (1) demonstrated ability to enhance the Presidio's financial viability and/or to rehabilitate and reuse an historic building; (2) responsiveness to the General Objectives of the GMPA and contribution to the visitor experience; and (3) compatibility with the Final Plan's planning principles and preferred uses.

In response to comments, the Final Plan provides that the Trust and the NPS will be the primary coordinators and providers of programs offered at the Presidio so that programs will be consistent year after year, dynamic and diverse, responsive to the interests of the broad public, and specific to the Presidio. The Final Plan has been modified to better articulate the Trust's goals of collaborating with the NPS and "seeking other partners that can bring the capacity and expertise needed to provide a consistently high standard of programming suitable to a national park in an urban setting." See Chapter One of the Final Plan.

With regard to program delivery and the shift from the GMPA's concept of relying on tenants to be the primary means of providing programs, there are several factors the Trust considered as part of this planning process. Primarily, this change from the GMPA is proposed in order to ensure that a consistent and well-coordinated set of programs is provided for the public even as tenants may change over time. The Trust acknowledges that tenants have missions and priorities that change, and that tenants themselves will come and go from the Presidio, which means that their programs will come and go as well if tied to their occupancy at the Presidio. In addition, if tenants are asked to provide and expend the capital funds needed for park rehabilitation and

improvements, requiring them to incur the additional financial burden of providing park programs potentially creates a disincentive to lease space within the Presidio. An additional enforced programming requirement becomes effectively a "cost of doing business" for the tenant and could therefore effectively become a form of rent offset. Furthermore, if the Trust were to include lease provisions requiring all tenants to provide park programs, the oversight responsibility of the Trust to ensure that all tenants delivered programs that are appropriate to the Presidio would be overly burdensome. (Refer also to Responses TS-1 through TS-4.)

The Trust Act mandates that the NPS, in cooperation with the Trust, be responsible for providing public interpretive services, visitor orientation, and educational programs. The Trust is committed to working with the NPS and other partners to provide a meaningful park experience for all visitors. The Trust Act also states that "The Trust may participate in the development of programs and activities at the properties transferred to the Trust" (Section 104(b)), and instructs the Trust to manage the property in accordance with the purposes of the 1972 GGNRA Act, which emphasizes "public use and enjoyment," and "recreation and educational opportunities." The Final Plan states that the provision of diverse programs that preserve and protect the park's resources, and that interpret and celebrate its history, can help bring people and the park together. It is anticipated that tenants, as well as other partners, can play an important role in providing an array of programs, but tenants will not be the sole provider of programs under the PTMP.

Some commentors support the concept that the Trust should be the primary provider of programs to ensure that park programs are commensurate with the park's national character, its rich history, and its diverse natural resources. Others assume that the Trust, because it is a federal agency, runs the risk of "homogeneity and conservatism" in this role. However, the PTMP articulates the Trust's commitment to providing a diverse array of dynamic programs that demonstrate both why and how the park is being preserved and its resources protected. The Plan states the Trust's commitment to work with the NPS and others to achieve that end. In response to those commentors concerned about the Trust's lack of staff or expertise in programming, the Final Plan further acknowledges that seeking out and developing partnerships will be important to enhance current programs and to develop new ones.

In response to those critics who oppose the Trust being the coordinator of Presidio programs, the Trust believes that the public programs component of the Trust's work can build long-term support for the park, can encourage active participation in caring for the park, and can enhance appreciation and enjoyment of the park's history and many resources. The Trust has worked in partnership with the NPS, the GGNPA, and other organizations to establish and maintain programs that engage volunteers, subject-matter experts, and park visitors in a range of activities, from sustainability and habitat restoration to historic preservation and archaeology. The Trust has worked with tenants and the NPS to interpret historic buildings, and to develop interpretive waysides and informational kiosks. The Trust will continue these activities and will explore additional ways to make the park as accessible as possible and to make the visitor experience compelling.

Some suggested that the city surrounding the Presidio is "overflowing" with program providers and that the Trust should not, therefore, provide cultural programs. The Trust recognizes that its resources are limited and that its program priorities need to be commensurate with its core mission. This has been clarified in the Final Plan, and the financial contribution to programming has been reduced. The Trust's own programming efforts, including cultural uses as explained in the Final Plan (see Chapter Two), will be directly related to the park. The Trust will work with the NPS to determine what some of these efforts should be. However, the Trust will ultimately be the decision-making body for Presidio programs in Area B, with public input, and will determine which programs the Trust itself has the capacity, expertise, and jurisdiction to provide. See Chapter Four of the Final Plan for a discussion of public involvement in implementation activities.

PR-2. ***Tenants' Role in Program Delivery***

Various commentors believe that programs should be delivered through tenants rather than by the Trust. The NPS notes that "provision of programs through a variety of sources would allow the possibility of significant visitor interaction with tenants, introduction of a broad range of activities and viewpoints, an increase in visitor access to historic structures, and the expression of the concept of a 'global center'...." One individual is unsure of how the "guiding themes of 'park to the people' and 'swords into plowshares'

fit in" and "how tenants fit with these concepts?" Others see a smaller tenants' role in programming as an ineffective way either to build the Presidio community or to integrate it into the larger community. ("If the Presidio community members feel they are simply tenants, without a sense of responsibility to the Presidio's growth as a community, then I feel there will be great difficulty persuading the rest of San Francisco of the vibrancy of the 'new Presidio'.") The CCSF Planning Department believes that if the tenant's role is limited to substantial lease payments or other revenue generation, it could threaten an economically and socially diverse tenant mix and program diversity.

Response PR-2 – With regard to comments recommending that programs be delivered by tenants rather than the Trust, see Responses PR-1, TS-1 and TS-2. The Final Plan states that the Trust, in cooperation with the NPS, will seek out program partners that may include organizations that occupy building space at the Presidio or those who may be interested in sponsoring or supporting Presidio programs in other ways. The Trust agrees with the comment by the NPS that provision of programs should be through a variety of sources that provide a broad range of activities and viewpoints. This concept has been strengthened in the Final Plan. See Chapter One, "Bringing People to the Park" section, of the Final Plan.

The Trust is also committed to fostering appropriate programs and activities to widen the community of Presidio stakeholders, including tenants and other park partners. Please refer to Planning Principle 13 of the Final Plan. As stated there, "the Presidio will become a vibrant community that will welcome the contributions of educators, environmentalists, leaders in technology, scientists, government agencies, private businesses, cultural institutions, non-profit organizations, and interested individuals." Some tenants will provide programs and visitor amenities, such as food and lodging; some will provide programs that are tied to their own mission.

Lastly, with regard to concerns expressed by the CCSF over tenant diversity and tenant selection, refer to Chapter Four, "Park Programs and Tenants" section, of the Final Plan. Tenant diversity is embraced because the Trust recognizes that a diverse tenancy will re-establish a vibrant community in the Presidio and is crucial to the preservation of the park and its many historic buildings. While the Trust will seek tenants that can help fund the preservation and enhancement of the Presidio's resources, those tenants will include those who can help to meet the community service needs of the park's visitors, tenants, and residents. Furthermore, the variety of building space available at the Presidio, most of which is historic, small-scale, and not competitive with "Class A" downtown office space, will help to ensure tenant and building use diversity. As explained in Chapter Two of the Final Plan, the Trust will balance office uses, with public uses of buildings, which would include cultural/educational uses and visitor amenities.

PR-3. ***Role of Others in Program Delivery***

Many commentors believe that the Trust should pursue programming within the Presidio in strong partnership with the NPS and with tenants and other organizations. This is stated in a variety of ways, all of which emphasize collaboration. The NPS supports a "collaborative approach," emphasizing partnerships and the contributions of park tenants as an integral part of developing the program spectrum. The GGNRA Citizens' Advisory Commission agrees that programming should be a "collaborative effort" among the Trust, the NPS, and the public. ("We urge that the effort begin as soon as possible and include the broadest possible array of professional and institutional, governmental and civic organizations with an interest in the themes outlined in the PTIP.") The GGNPA wishes to explore various potential avenues for collaboration in both public programs and facility needs, including "linkages to the Presidio Trust programs and those of other Presidio partners, common marketing, use of other Presidio facilities for special program needs, and the potential use of transportation shuttles for outreach purposes." The Presidio Tenants Council seeks "a forum for collaboration," while Swords to Plowshares sees a "collaborative partnership" to "create dynamic and accessible programs that can draw a diverse public." The Exploratorium recommends that programming take maximum advantage of the resources available from regional, national and local institutions and organizations, as well as tenant organizations. ("Many institutions and organizations have long histories and excellent records of success with existing programs and development of new programs that would be appropriate at the Presidio. In addition, the Trust will not have to develop or divert the resources, financial or otherwise, to be able to develop meaningful

programs, visitor experiences and regional, national and global outreach, that the Trust be encouraged to partner with capable institutions and organizations…") Finally, one of the speakers at a public hearing representing the Presidio Performing Arts Foundation finds it essential that the Trust develop, coordinate, and oversee cultural programming with partners both inside and outside the park.

Response PR-3 – The Final Plan states the Trust's commitment to collaboration with the NPS, the GGNPA, and other organizations for interpretation of the Presidio's stories and delivery of programs. Refer to Planning Principles 11, 12, and 13 in the Final Plan for this discussion; included in this text is a description of current programs, including partnership activities with the NPS, GGNPA, and others. The Trust agrees with commentors who state that collaboration among different groups, both local and national, keeps programming dynamic by bringing together different perspectives and different resources. The Trust agrees that collaboration and outreach will also be important to help the Trust leverage resources needed to provide a spectrum of expertise as well as a wider audience.

Examples of current program collaborations at the Presidio that would continue or be supplemented include veterans organizations' work with the Trust to produce a Memorial Day event that draws thousands; local and national non-profit organizations' work with the Trust to sponsor runs and other activities to raise monies and awareness about social issues; the Trust-sponsored Moraga series, which brings subject-matter experts to the Presidio and provides a venue for local performers; the Trust's sustainability, recycling, and composting programs that are part of the park's daily operation and maintenance and are helping to establish the park as a model for urban conservation; volunteer programs that contribute to the restoration and protection of the park's natural resources and encourage ongoing stewardship; and school groups that come and explore the Presidio with the help of NPS rangers, Trust staff, or on their own.

The Trust recognizes the value of and is participating in joint efforts to optimize the use of alternative modes of transportation to provide greater access to Presidio facilities and establish connections among the various programs provided by the Trust, the NPS, tenant organizations, and others. Refer to Planning Principle 14 of the Final Plan in regard to improving access for visitors to program activities.

PR-4. ***Role of NPS in Program Delivery***

Some commentors, such as the Pacific Heights Residents Association, argue that the NPS rather than the Trust should take the lead on programming, and refer to the Trust Act (Section 102(b)) to support their position. Others, such as the CCSF, would like to see the NPS role in programming made more clear.

Response PR-4 – The Final Plan (like the Draft Plan) articulates the Trust Act's direction regarding the role of NPS in interpretation. The Act states that the NPS, "in cooperation with the Presidio Trust, shall be responsible for providing public interpretive services, visitor orientation, and educational programs" for the Presidio. The two agencies work cooperatively on interpretation and other programs and are currently preparing an interpretive strategy for the Presidio that will guide interpretive programming into the future. This document will lay the foundation for an effective partnership among the Trust, the NPS, and others and suggest future interpretive program improvements or expansions. Refer to Planning Principle 11 of the Final Plan. See also Responses PR-1 and PR-3.

Section 102(b) of the Trust Act defines a cooperative arrangement, not a hierarchy, for the Trust's work with the NPS. This Trust Act provision should be read as creating a "floor," not a "ceiling," for the Trust's program work. In other words, in addition to the interpretive and other visitor-oriented services that NPS will provide in cooperation with the Trust, the Trust may offer additional visitor-oriented programs. See Presidio Trust Act, Section 104(b). The NPS has both limited staff and limited financial resources available to dedicate to Presidio programs. Coordination with the NPS is focused on those areas where both NPS expertise and available resources can be optimized. The cooperative efforts of the two agencies will seek to enhance the quality and breadth of public programming, to leverage resources of both agencies, and to avoid duplication of effort. This does not preclude the possibility that each agency may undertake some programming independently (as the Trust did, for example, with its Moraga lecture series).

SCALE OF PROGRAMS

PR-5. ***Effect of Increased Program Levels on Development***

A number of commentors, including the NPS, are concerned that an increased level of programs would influence the level of new construction and demolition in the quest for increased revenues, and cite the text of the Draft Plan ("program quality and quantity would depend upon the Trust's ability to generate lease revenue") to support their position. The NPS concurs that programs are an important element of the effort to bring the Presidio alive; however, they maintain that the addition of new construction to meet these needs should be carefully weighed against the preservation of the important natural and cultural resources within the park. ("The Presidio Trust's proposal to allocate up to $10 million of its own funding for programming does not appear essential to its mandate. Yet this proposal requires corresponding leases and development to generate $10 million annually in net income.") NAPP warns that the "robust programming presented in the plan may be driving an excessive and inappropriate amount of real estate development to achieve the dollars needed to support such a goal." Another neighborhood organization, the Telegraph Hill Dwellers, tells the Trust that "you want to build buildings and other facilities that you shouldn't build in order to generate revenues to finance the sponsorship of activities that you shouldn't sponsor. We don't want you to try to 'make a difference' in our lives; we just want you to preserve and enhance the Presidio as a glorious national park." Others contend that by selecting more tenant organizations with missions relevant to the national park mission, the tenants could provide appropriate programs at less cost and reduce the need for the Trust to overdevelop in order to pay for "aggressive program plans."

Response PR-5 – The level of programming proposed in the Final Plan is not the basis for the proposed levels of demolition or new construction under this alternative. Other planning and policy goals, such as increasing open space and providing sufficient housing for Presidio employees, influenced the Plan's proposals related to demolition and new construction. Developing and delivering a robust set of programs is not directly related to new construction. The Final Plan clarifies these points. Although the Final Plan recognizes the potential for some new construction and provides more specific information in the way of examples, allowing for the possibility of new construction is not motivated by the need to generate revenue that would then support programs. Rather, new construction will be used as a tool through the course of implementation to allow the feasible and cost-effective rehabilitation and reuse of historic buildings, and in some cases to achieve other Plan objectives. See Response NC-1. New construction would also be subject to additional planning, analysis, and public involvement prior to implementation.

The Presidio is a place for the public, and the Trust makes a commitment in the Final Plan to preserve and protect the park's valuable resources and to make the park as accessible as possible to the many, not the few. The Presidio's cultural, natural, scenic, and recreational resources will be the cornerstone for Presidio programming. Diverse and dynamic programming, including the provision of visitor amenities, special events, and stewardship programs, is an effective way of creating access and strengthening this commitment to the park.

In response to public comment and concerns that the Trust had set its park programming goals too high, the Trust has modified the Final Plan to reduce the Draft Plan's assumption of $10 million annual expense for programs to a more modest goal of $5 million annually. In Fiscal Year 2001, the level of expenditure for park programs was approximately $2 million, and the Trust hopes to increase this amount gradually over time to $5 million and to seek philanthropic funding to supplement Trust resources. In addition, the Trust will leverage activities undertaken by park tenants and supporting partners who can provide programs and services to park visitors; feasibility studies will also be conducted to explore funding options as part of program implementation. Refer also to Response PR-19.

The Final Plan, in Chapter Four, "Park Programs and Tenants" section, explains that the level and nature of future programs will be influenced by three factors: (1) the ability of the Trust to generate funds to pay for a program's operating and capital costs, (2) the effectiveness of collaborative efforts between the Trust and the NPS, and (3) the ability of the two agencies to engage partners. However, the Trust's highest priority for funding, particularly over the next several years, will be the protection and preservation of the Presidio's valuable resources.

PR-6. ***Effect of Increased Program Levels on Visitation***

Various commentors, including several neighborhood organizations and the Sierra Club, raise concerns that increased programming would draw too many visitors, and associated traffic and congestion, to the park. The Lake Street Residents Association "question the wisdom of providing programs that already exist elsewhere. Drawing huge numbers of additional visitors to the Presidio as a destination seems incongruous with its status as a national park. A focus on the Presidio as a destination for the exchange of far-reaching ideas can establish the Presidio as a preeminent forum without having to draw throngs of daily visitors. We hope that big does not win out over aesthetics." PAR recommends that the Plan be revised to specify that there should be a mix of tenant-and Trust-sponsored programs appropriate in content and size for the Presidio. ("If devoted primarily to museums, 930,000 square feet could provide space for several large museums, which could negatively impact traffic, visitor experience and the setting.")

Response PR-6 – The Presidio is first and foremost a park in an urban setting, and it is part of the GGNRA; as such, it is a destination for the public, far and wide. The alternatives analyzed in the EIS evaluated varying amounts of building square footage and levels of public programming that would potentially draw visitors. In proposing the Final Plan Alternative as its preferred plan, the Trust has carefully considered the potential effects on visitor levels, traffic congestion, and the aesthetic character of the park. The projected number of visitors under the Final Plan Alternative is lower than the number of park visitors estimated under the 1994 GMPA, a plan that many commentors find acceptable or preferred. See Response VE-1. The projected number of visitors under the Final Plan Alternative is also lower than the numbers projected for both the Sustainable Community and Cultural Destination Alternatives. The Trust's Final Plan offers public accessibility and programs without drawing the "throngs" that other alternatives might have fostered.

For clarification, neither the Draft Plan nor the Final Plan anticipated that 930,000 square feet of building space would be dedicated to museum uses. To clarify this, the EIS and Plan have been modified to provide definitions for cultural and educational uses; see Section 4.4.1, Land Use, of the Final EIS and Chapter Two of the Final Plan. The building square footages for these two uses have been disaggregated. Refer to Response PR-9 for clarification of the anticipated extent and location of museum use under the Final Plan Alternative.

With respect to the impacts of the 530,000 square feet of cultural uses in the Final Plan Alternative, these potential environmental effects have been fully analyzed in the Final EIS. Refer to Section 4.5 of the Final EIS for full discussion of transportation and circulation effects, and Section 3.4.4 for a complete discussion of effects on the visitor experience.

PR-7. ***Reserving Building Space for Program Partnerships***

Several arts organizations ask the Trust to delineate buildings to be used for arts, cultural, and institutional uses and ensure that higher-rent-paying uses do not displace these uses. Some commentors, such as the Sierra Club, although they champion adoption of the GMPA, do not agree that some tenants should be subsidized. The Sierra Club comments that no tenants should be accepted that would pose a continuing operating subsidy or other financial demand on the Trust. Others believe financially stable tenants should help underwrite the needs of desirable, but possibly under-funded tenants. One individual remarks "having some tenants pay market rate, while non-profits pay a reduced rate is working, and no further fees should be placed on market rate paying tenants."

Response PR-7 – Neither the Draft Plan nor the Final Plan provides building-specific information as requested by the commentor. Rather, given the programmatic nature of the PTMP, the Final Plan generally provides square footages Presidio-wide (Area B) by use category and states use preferences for each planning district. There are some limited exceptions, such as the Final Plan's identification of the Commissary building as a preferred location for a museum use. Figure 2.2 of the Final Plan illustrates the Trust's preferred areas for cultural and educational uses, with square footages for affected planning districts. Existing cultural and educational uses (such as the Officers' Club and the chapel), which constitute approximately 100,000 square feet of building space, are identified, as is the Commissary (another 100,000 square feet), leaving the location of about 330,000 square feet of cultural program space to be determined.

The specific buildings dedicated to public-oriented use will be determined over time and will be determined largely by what the economics of building use can support as well as the opportunities that are presented. The Presidio does not offer one kind of space and there is no one market for space in the Presidio. Much of the space is appropriate for the kind of social or cultural programmatic uses commentors describe, and the Trust will issue RFPs for tenants that can make appropriate use of specific kinds of space, i.e., that represent the Plan's "preferred uses." The Final Plan envisions one-third of the building space for public uses (cultural, educational, visitor, or community uses). The Trust will actively seek tenants who can contribute to the liveliness of the park either through programs that are directly related to the park's resources or through programs that add a further cultural and/or social dimension.

With regard to comments against tenant subsidies, the financial analysis conducted as part of this planning effort makes rental assumptions for cultural/educational space that are commensurate with an average market rate for such uses. See Responses FI-4 and FI-5.

PR-8. ***New Construction to Meet Park Program Needs***

Several commentors, including various historic preservation groups, maintain that the Trust should not introduce new construction to meet park program needs. The NPS states "the consideration of cultural programs is an important element of the effort to bring the Presidio alive, however, the addition of new construction to meet these needs should be carefully weighed against the preservation of the important resources of the Presidio, both natural and cultural." The Fort Point and Presidio Historical Association suggests that "funding for first-rate historical museums and interpretive programs does not necessarily require significant new construction" and the California Heritage Council advises the Trust that "you should use existing buildings not new construction for these programs." One individual quips: "'If you build it…they will come' is a myth that only works in the movies." Others see new construction as beneficial and are specific in their ideas. For example, one individual hopes to see a mid-size convention center at the location of the current parking lot between Montgomery and Anza Streets "to generate a steady flow of income and actually improve the appearance of the Presidio."

Response PR-8 – The Trust has provided clarifications regarding the intended use of new construction in the park in part to allay the fears of commentors that program and museum uses will drive large-scale new construction. Commentors misunderstand the intention behind the proposed levels of new construction in the Draft Plan Alternative; the Final Plan Alternative has been clarified in response to these and other comments. The Plan does not propose new construction to provide additional large-scale buildings as venues to host programs, but rather emphasizes rehabilitation and reuse of existing buildings for preferred uses, including program-related uses. While allowing new construction to provide a cultural or educational venue is not precluded, the Final Plan clarifies that non-residential new construction will be primarily used to facilitate rehabilitation of historic buildings by providing building additions or annexes. One such example is the Presidio Theatre, where some amount of new construction, in the form of a building addition, will likely be required to return the building to active use. See Responses PR-5 and NC-1. The Final Plan does not propose any "convention center" uses as one commentor suggests. The Final Plan allows for some small-scale conference-type uses in venues such as the existing Golden Gate Club, and the potential for additional conference spaces in the Fort Scott, Main Post, and Crissy Field planning districts.

In response to comments that suggest museum use will drive the need for new construction, the Trust does not agree that this is the case. The Trust believes that museums are appropriate in a park and they can be used to tell the Presidio's rich interpretive stories. The NPS Visitor Center (Area A) at the Main Post is one such facility. The Plan looks to the reuse of a number of currently existing facilities to accommodate museum uses. Specifically, the Plan identifies the existing Commissary as an appropriate structure for reuse as a museum, and Congress has authorized a feasibility study for the building's potential use as a Pacific Coast Immigration Museum. Building 640 is also the subject of a feasibility study for reuse as a museum and interpretive center in partnership with the National Japanese American Historical Society. Museums are expensive to establish and operate, and these proposals would require outside sources of funding. These studies will continue after the completion of the PTMP planning process and will include opportunities for public input.

PR-9. ***Clarifing Amount of Space for Cultural Institutions***

A number of commentors request that the Trust clarify the amount and type of space that would be devoted to cultural institutions providing programs for park visitors. The Fort Point and Presidio Historical Association believes that such clarification would help allay fears and garner public support for these programs. (One individual considers the scale of proposed program concepts as "grandiose," points to the 930,000 square feet of building space for "cultural/educational" use in the PTIP, and exclaims "that's roughly twice the square footage of the Transamerica Pyramid!"). PAR finds it difficult to assess fully the implications of the proposed 'cultural/educational' square footage because the Trust has not broken down separate categories for cultural (museums) and educational (schools) use. They and others request that the Plan be revised to separate cultural from educational uses, identifying separately the square footage for such "educational" uses as schools, conference centers and meeting rooms.

Response PR-9 – In response to comments, the Plan and the alternatives in the EIS have been clarified by providing a breakdown of square footage for cultural and educational uses. Furthermore, definitions of these use categories have been included in both the Final Plan and the Final EIS. Cultural uses could include interpretive sites, exhibit space, performing arts venues, community facilities, artist studios and more. Educational uses may include formal curriculum-based programs for children or adults, as well as less formal programs, workshops, or tutorials. Other educational uses may include "think tanks" or research institutions. Both public and private organizations would be considered, and priority would be given to tenants who use the Presidio as an educational tool (e.g., as an "outdoor classroom"), who offer services to park visitors, or whose constituencies are national in reach. Figure 2.2, Cultural and Educational Uses, in the Final Plan illustrates the Trust's intent for preferred locations and square footages for these uses.

In the Final Plan, the total amount of square footage for cultural/educational uses has been reduced from 930,000 to 920,000 square feet. Of this amount, cultural uses (which include interpretive sites, museums, artist studios, performing arts venues, and more) are preferred for approximately 530,000 square feet, principally at the Main Post and Crissy Field (Area B). Educational uses are preferred in approximately 390,000 square feet, largely at the Public Health Service Hospital and Fort Scott planning districts.

Approximately 100,000 square feet of building space in Area B already hosts cultural uses. See Chapter Two of the Final Plan. The Final Plan also states that the Commissary (approximately 100,000 square feet) would be the preferred location for a museum, should an appropriate program be proposed and prove to be financially feasible. As indicated in the GMPA, the hangars at the west end of Crissy Field are another possible location for a museum.

PROGRAM CONTENT

PR-10. ***Definition of "Cultural and Educational Uses"***

Commentors wish to see a clear definition of "cultural and educational uses" to analyze and evaluate the impacts of the Plan. Various commentors ask the Trust to identify the types of programs it envisions for "smaller museums," "major museums," "enhanced interpretation," and "travelling exhibitions and programs," and the anticipated funding levels of each type of program. One individual fears that no rationale or maximum number given for the number and size of new museums is a "grotesque loophole and could lead to placing a museum in a building like the PX at Crissy Field." A Presidio tenant would like to see language describing "culture" at the Presidio broadened to specifically refer to the arts, history, scientific inquiry, and the life of the mind. ("In particular, the concept of culture should be extended beyond the notion of "military history and culture" or the activities that have a clear precedent in the life of the military communities that occupied the Presidio.")

Response PR-10 – The Final Plan has been modified in response to comments to provide more definition for the terms "cultural programs" and "cultural uses." See Responses PR-9. Cultural uses could include venues for interpretation, exhibit space, performing arts, community meetings, art studios, or other appropriate uses. The exact nature and content of cultural program uses is not presently known and therefore cannot be prescribed with specificity in the Final Plan. As with other uses and tenants at the Presidio, the exact nature of cultural or educational programs depends upon the availability of interested program tenants, the Trust's ability to foster and enter into program partnerships, and market and outside funding factors that simply are

not known. The Plan creates a policy framework supportive of uses that are accessible to the public, and identifies preferred locations for cultural uses if they can be found, but until specific program users or partners make specific program proposals, the Trust cannot be more specific about the exact nature or identity of the programs or program users.

With respect to funding levels for specific programs, other than the general funding goals discussed in Responses PR-19 through PR-22, the Trust has not established more specific budgets or funding levels for specific types of programs.

Museum uses have been clarified and better defined in the Final Plan. See Response PR-8. The Plan also includes examples of existing programs. See Chapters One and Two of the Final Plan.

PR-11. ***Duplication of Programs in San Francisco***

Commentors urge the Trust to avoid duplicating and competing with capable institutions and organizations in the San Francisco area. The Cow Hollow Association recommends that programs be designed with public input and avoid duplicating and competing with existing resources in the San Francisco area. This recommendation is supported by the California Native Plant Society, which asserts that "devoting scarce Trust financial resources to creating curatorial infrastructure makes little sense in San Francisco where there are much stronger and larger cultural institutions whose missions are more directly focused on such matters." ("Such exhibits properly belong at the DeYoung, Legion of Honor, or the Asian Art Museum, not at the Presidio. The Presidio should not be competing with established Bay Area institutions, but rather maximizing public awareness of its own unique attributes.")

Response PR-11 – In response to public comments, the Final Plan provides some parameters for the kinds of programs that would be considered for the Presidio. See Planning Principles 11 through 14 and Chapter Two, "Public Use" section, of the Final Plan. The Trust does not agree that the San Francisco Bay Area has a limited capacity for cultural programs, but recognizes that its own capacity for providing programs is limited. For this reason, the Final Plan articulates the importance of partners with expertise in delivering programs. The Trust agrees with the commentors that public input will be important to keeping programs vital, and will therefore find effective ways for the public to provide input. Annual public workshops such as those undertaken for the Vegetation Management Plan (VMP) are one possibility.

The Final Plan states that programs for park visitors will be provided through the collaborative efforts and resources of the Trust, NPS, park tenants, and other program partners. Tenants will also bring programs to the park that might not serve park program objectives, but would nonetheless contribute to the liveliness of the Presidio. The Trust also hopes to maintain and expand natural resource and sustainability programs, as well as the commemorative events and festivals that currently take place, and hopes to add new events, such as the Main Post Open House and the Open Park Day held in Spring 2002, to promote more of the park and allow the public to explore its history and natural resources. These events add a public component to the work that the Trust does and offer the public an important opportunity to experience the scope, the importance, and the success of the Trust's activities. The Trust also hopes to expand its outreach to schools through programming aimed at children, and will look for partners to offer more educational and recreational opportunities for children in the park.

Refer also to Response PR-14 for further discussion of issues raised.

PR-12. ***List of Cultural Institution Concepts***

The NPS requests that the Trust list specific cultural program concepts that would carry out the essential themes of the Presidio.

Response PR-12 – At this point in time, in this programmatic-level planning document, the Trust is not in a position to specify which cultural program would be pursued to carry out themes essential to the Presidio. The two specific references made in Chapter Two of the Final Plan makes specific references to two feasibility studies mandated by Congress, one for the reuse of Building 640 (a study that is underway, in partnership with the National Japanese American Historical Society) and one the Pacific Coast Immigration Museum, a study that is being conducted by the NPS in collaboration with the Trust. The Final Plan embraces the concept of partnerships to help fulfill programmatic goals developed in collaboration with the NPS over the course of Plan implementation. It is also anticipated that the interpretive strategy for

the Presidio, currently being developed in collaboration with the NPS, will lay the groundwork for determining the Presidio themes and stories that should be told.

PR-13. ***Program Themes***

Several commentors assert that the program themes have changed and become too generalized from the original themes of the GMPA. They say that the current themes are value-neutral and fail to evoke the idealism of the GMPA, and recommend that the Trust realign the programming back to the more specific, value-laden themes of the GMPA. One individual is "disappointed" by the Trust programming because it undermines the vision of the GMPA. The Pacific Heights Residents Association finds that four broad, interrelated program areas stated in the GMPA are best suited for the Presidio based on its facilities, setting and park purpose: stewardship and sustainability, cross-cultural and international cooperation, community service and restoration, health and scientific discovery. The Sierra Club asks that the Trust include only those program activities proposed in the GMPA.

Response PR-13 – The four themes that commentors reference from the 1994 GMPA are programmatic themes by which tenants would be selected under the GMPA. Chapter One of the Final Plan instead articulates five interpretive themes that are intended as the focus of interpretive programming: Military History, Crossroads of Culture, Restoring Natural Systems, Changing Landscapes, and Transformation of the Presidio from "Post to Park." See Planning Principle 11 of the Final Plan. The five interpretive themes will serve as underpinnings of the Trust's ongoing collaboration with NPS to develop an interpretive strategy for the Presidio. The Trust does not concur with the comment that these programming goals undermine the vision of the GMPA. The kinds of programs suggested by the GMPA were exceptionally broad and would in no way be prohibited by the Final Plan.

PR-14. ***Relationship of Program Topics to Presidio***

Commentors' opinions on Trust programming vary widely. On one hand, commentors ask the Trust to explain how expanded concepts of education (such as the uniquely western perspective on the American experience; the role of immigration, domestic migration, innovation, and technology advancement; and the future of transportation technology) tie in to the mandate to preserve and interpret the cultural and historic values of the Presidio. They note that recent examples of Trust programs, including Russian paintings and Japanese woodcuts, demonstrate little evidence of connection with its mission. The Presidio Tenants Council believes that "only the walks and talks sponsored by the NPS really deal with the park." Commentors expressing this opinion by and large ask that the Trust restrict program activities to subjects related directly to the Presidio. In contrast, groups such as the Youth Commission's Culture and Urban Environment Committee ask the Trust to expand upon existing historical, educational, and environmental programs. ("History determines our perception of the past and present . . . We ask that you continue the success of these programs; particularly in establishing a cultural center reflective of the diversity of this city and of the history of the Presidio.")

Response PR-14 – In response to comments, the Programs section of the Draft Plan has been heavily modified, and the concepts presented there scaled back. Chapter Three, Programs, of the Draft Plan is no longer a stand-alone chapter; instead, concepts about the types of programs, collaboration with the NPS and other program partners, and park preservation and stewardship have been folded into a new section about bringing people to the park. See Chapter One, Planning Principles 11 through 14, of the Final Plan. Specifics regarding square footage and preferred locations for cultural and educational uses are now described in Chapter Two of the Final Plan. The Final Plan also states clearly that the Trust's primary goal is park preservation and providing for a meaningful park visitor experience; thus, the Final Plan ties proposed programs back to this overarching vision.

Recent exhibitions at the Presidio Officers' Club, which were part of the pilot program "At the Presidio," as described in the Draft Plan, generated much comment. Many recognize the inherent quality of the programs and applaud the Trust's contribution to the area's cultural scene. But others question the wisdom of the Trust funding a program that appeared so ancillary to its core mission and that appeared to duplicate programming found elsewhere in the region. Since that time, and as a result of lessons learned from this pilot program, the Trust has scaled back its exhibition program, and the Plan has been revised to adjust the financial commitment to cultural programs. See

Response PR-5. With the resources available, the Trust will focus its programming efforts on expanding park stewardship, sustainability, and education programs, and strengthening partnerships with the NPS, the GGNPA, and other program partners.

The Trust is committed to reaching the broad public in its programming effort. Programs will therefore be varied, ranging from hands-on participation and lectures to commemorative events and children's activities. Building participation and support is a Trust goal. The Trust hopes to accomplish this by establishing a core of programs that is dynamic enough to engage the public at many levels of interest and understanding, consistent enough to develop a deeper understanding of the park, and flexible enough to grow and change over time.

PR-15. ***Program Priorities***

Commentors had widely varying views of what would be an appropriate mix of programs, both in content and size. The NPS feels that new program facilities should be considered only if consistent with NPS Interpretation Management Policies.[1] The California Native Plant Society and others support the Trust's intention to provide programs for visitors of all backgrounds, but are troubled by the Trust's commitment to provide programs for visitors of "all interests." They maintain the Trust should not try to make the Presidio "mean all things to all people". ("...it is absolutely essential that... the mission of the park remain unaltered. People primarily interested in race-car driving, model trains, or Renaissance paintings should not expect to find fulfillment in the Presidio.") San Francisco Tomorrow shares this opinion. ("Programming and events should be limited in purpose to subject matter areas which are special to the Presidio and appropriate for a national park.") One business with experience in programming at Yerba Buena Gardens offers that changing social conditions and patterns makes it "extremely important to activate a space to welcome a diverse group of visitors so that one group does not dominate and disrespect this incredible national treasure." They "support the Trust's vision to have programming in the park that is appropriate to the space and within the budget available." Another individual is troubled with charging "$25 for admission to an art exhibit," as it "simply flies in the face of the mission of the Presidio as a 'park to the people.'"

Response PR-15 – The Trust agrees in principle that programming and events should be limited in purpose to subject areas that are "special to the Presidio and appropriate for a national park." While the Trust is not subject to NPS Management Policies, the Final Plan is not inconsistent with the policies cited. Program facilities will primarily be located in existing buildings, and will bring people to the park for reasons that facilities outside the park could not. The Trust will ensure a consistent standard and coherent offering of park programs that is provided in collaboration with the NPS, park tenants, and other partnerships that leverage Trust resources and expand the park's visitorship. See Chapter One, "Bringing People to the Park" section, of the Final Plan, and Responses PR-1 and PR-4.

The Trust recognizes the need for a core set of programs appropriate to the space, within the budget available, and varied enough to correspond to both diverse resources and a reasonable spectrum of public interest. Given the different kinds of space and the variety of activities, from historic preservation to habitat restoration, the programs at the Presidio will be varied. Tenant programs and activities, which may not be tied to the themes of the park, will contribute to the liveliness of the park and the vitality of the Presidio community.

PR-16. ***Support for Educational and Environmental Programs***

A number of commentors generally express support for and/or offer specific suggestions for appropriate educational and environmental activities within the Presidio. One education and recreation organization asks the Trust to collaborate with the San Francisco Unified School District to establish a "cultural center reflective of the diversity of this city and of the history of the

[1] Section 9.3.2 ("... should be provided only when the private sector or other public agencies cannot adequately provide them in the park vicinity...") and Section 9.3.1.7 ("...Permanent facilities may be built specifically for cultural activities only when [5] criteria are met: necessary to tell park story, temporary facility impractical, adaptive use impossible, no impairment of cultural or natural resources, infeasible for others outside park to provide the facility.")

Presidio." Another education and recreation organization is "extremely pleased" with the kinds of youth-oriented programs that are being considered, and suggests ropes courses as a team-building opportunity for young people. Other suggestions include a Presidio Children's Center for Performing Arts, better transportation so that students can take better advantage of the park, and more youth and nature classes for Girl Scouts and Boy Scouts. Groups generally agree that the Trust should partner with organizations already working with children and foundations interested in supporting such efforts. For example, one natural resource conservation organization is very appreciative of the Presidio Trust's ongoing support for the stewardship program, and notes that "its contributions to nursery operations, interpretive and education programs, and other stewardship programs are essential to the future of biodiversity at the Presidio."

Response PR-16 – Many kinds of programs, including recreational programs, museums, and annual festivals, could be linked to what is essential to the park's mission, and this is articulated in the Final Plan. The Trust will balance its resources to provide a varied offering of programs. The Trust will continue its collaboration with the NPS and the GGNPA to support stewardship programs and other educational opportunities in the Presidio. The Trust has established relationships with educational institutions and will develop other partnerships that bring expertise in youth programs. Programs could include leadership, environmental, and natural resources education, as well as interpretive and recreation programs. See Responses PR-9 and PR-11.

PR-17. ***Support for Arts Programs***

Various commentors provide ideas about how the Trust could foster the long-term placement of performing arts in the Presidio. Suggestions include developing a multi-faceted culinary center, reserving space for square dancing and folk dancing, establishing an 'ARTISANfrancisco' for crafts people and a Presidio Children's Center for Performing Arts, and providing a creative arts and media center at the Battery Dynamite site. One commentor feels that all such should be centered in nature ecology and sustainability.

Response PR-17 – The Trust will focus its own program efforts on programs that address the history, resources, and preservation of the Presidio. However, the Trust is receptive to public programs that tenants and other partners can provide, from exhibits to performing arts. Space and time will be set aside at the Presidio for community events, such as meetings, lectures, concerts, and other entertainment and recreation. See Response PR-2.

PR-18. ***Museums, Exhibits, and Events***

This issue generated many comments. Commentors note that the PTIP calls for roughly three times as much museum space as the GMPA. Most commentors, including the Sierra Club and San Francisco Tomorrow, feel that the Trust should exclude exhibits and museums with themes only marginally connected to the Presidio and limit exhibits and museums to those needed to interpret the military, cultural, and natural history of the Presidio. ("Allocating funds for traveling museum shows that lose money such as the 'Treasures of Imperial Russia' should not be pursued.") Commentors expressing this opinion generally believe that the Trust should not construct any new museum buildings or fully fund museum space in the park. PAR and other organizations believe that any museums should be appropriately sized and Presidio-related (e.g., a museum of moderate size related to the history of the Presidio or the West). Several find little connection between the proposal for museums and institutes and the suggested themes for a Presidio interpretative program. California Native Plant Society sees "grave danger" in devoting buildings or financial resources to public events and programs that have little connection to the Presidio's history or to the mission of the national park system. Another individual exclaims "Technology exhibits and museums have no place in a national park!" Others are more enthusiastic in their support for museums and other institutions, particularly those they consider relevant to the Presidio's natural, cultural, and military history. For example, the Fort Point and Presidio Historical Association strongly supports facilities and exhibits on military and aviation history and museums and historical programs at Crissy Field. The historical association also refers to the recent Holocaust Exhibit as "excellent" and the lecture about the Italians and the aid they provided Jews during World War II as "fascinating," and encourages the Trust to sponsor more such activities. Many themes for museums are offered, including a Pacific Coast Immigration Museum, a California Indian Museum, an African Heritage Museum and Educational Center, buildings (specifically Building 640 at Crissy Field) interpreting the history of the Japanese American community in the Presidio, geological museums, institutes that

offer "a uniquely western perspective on the American experience," and maritime military history (such as coastal artillery) and aviation museums.

Response PR-18 – As discussed in Response PR-9, the Final Plan clarifies that 530,000 square feet of space are anticipated to be used for cultural tenants and activities such as museums, interpretive sites, artist studios, theatres, and more. Of this 530,000 square feet, 100,000 square feet are already occupied or reserved, and another 100,000 square feet are targeted at the Commissary building, which may host a museum if outside sponsors and funding can be identified. The Trust recognizes the need to concentrate its resources on programs that are integral to the preservation of the park, such as stewardship and volunteer programs, and on cultural programs that make the history of the park more accessible to the broad public. The Trust believes that museum and exhibitions would be appropriate in the Presidio; however, they would have to be funded by an external source. The Trust is committed to using its resources for programs that are specific to the Presidio, but recognizes the value of other interests and perspectives and believes that a variety of programming can contribute to the vitality of the park.

Congress has requested that the Trust and the NPS collaborate to study the feasibility of establishing a Pacific Coast Immigration Museum at the Commissary, or at another site, in addition to rehabilitating Building 640 as a museum that focuses on the role of Japanese Americans in the history of the American West. The study is underway, but is in its preliminary stages. The Trust believes that each of these ideas is appropriate, if the funding can be found. Proposals for other museums that help to interpret Presidio stories would also be welcome for consideration in the future.

PROGRAM FUNDING

PR-19. *Funding Mechanism for Programs*

Some commentors seek clarity regarding the funding mechanism for Presidio cultural programs. For example, the California Heritage Council, while pleased that the Presidio's history will be interpreted, asks that the Trust more closely identify the anticipated funding for each type of program ("we feel that historical, educational and cultural programs would make the Presidio a world-class park… the Trust should identify how [it] intends to acquire the funding for these programs such as philanthropic, corporate, or a non-profit that could coordinate program activities and raise financial support privately."). Several individuals are not convinced that the Trust should incur a "major increase" in its operating expenses to assume primary responsibility for public programs. Others, such as the CCSF Planning Department, believe that the provision of programming should not be subject to financial considerations.

Response PR-19 –The Trust believes that, as a national park, the Presidio is an appropriate place for providing programs that allow the public to explore the park, its history, and its natural resources. Although the CCSF Planning Department wishes that the provision of public park programming not be subject to financial considerations, public programs cost money. In Fiscal Year 2001, the level of expenditure for park programs was at a baseline of approximately $2 million. The Trust hopes to increase this amount over time to $5 million. The Final Plan sets a goal of allocating $5 million annually in Trust revenues, supplemented by outside sources (including philanthropy), to support Presidio programs in the future. This goal is expected to be achieved over time, and at the start the Trust will sustain only a baseline level of funding for park programs while it places higher priority on funding protection and preservation of park resources.

Currently, both the Trust and the NPS dedicate funds to park programming. Cultural institutions, such as museums, are expensive to establish and operate, and would therefore have to be funded by sponsoring organizations or outside sources. To make the park more accessible through a wider range of programs and media, the Trust will attempt to augment current funding and develop a variety of partnership and funding sources, including philanthropy, to support programs beyond those currently available through the Trust, NPS, and tenant organizations. Chapter Four of the Final Plan includes additional discussion about the need for seeking philanthropic dollars through the course of implementation to achieve certain program goals. Refer also to Response PR-5.

PR-20. *Programs Funded at GMPA Levels*

The Sierra Club and various other commentors request that the Trust hold program and event expenses to those levels identified in the GMPA. Both the

Sierra Club and the NPS ask the Trust to include in parkwide expenses a base level of funding for programs, museum collections, and natural resource projects that are clearly linked to the park's mission, its sustainability, and the future of biodiversity at the Presidio. The NPS further recommends that program expenses be based on the stated mandates of the Trust Act to conform to the GGNRA enabling legislation, the general objectives of the GMPA, and the need to manage the resources of the park. Several of the commentors maintain that any level of programs and related expenses above the GMPA level would result in a delay of the rehabilitation and availability of buildings at the Presidio, and should be provided only if funded by outside sources, rather than the Trust budget. California Lawyers for the Arts believes that the community would be "better served by expediting the return to active use of the buildings in the park—allowing the tenants to provide programs."

Others, such as San Francisco Beautiful, disagree with this base level and suggest that allocating $10 million to programming is a "reasonable, even modest," annual Trust budget for program activities. One individual tells the Trust, "I support your idea of putting $10 million towards programming, specifically youth programming, in the form of grants, space, and other support."

Response PR-20 – The Trust agrees with commentors that a baseline level of funding to support park programs is both needed and desirable. Important park programs, many that are linked to some commentors' interest in fostering programs related to educational, environmental, and natural resource protection goals, are currently being funded by the Trust, and the Trust hopes and expects to continue these programs. Examples of some of the programs benefiting from Trust revenues are identified in Chapters One and Two of the Final Plan. The Trust is likely to provide only a baseline level of park programming and funding support that may include one-time capital investments for establishing a program venue and/or funding of annual operating costs. The Trust disagrees, however, that it should limit its goals for park program funding to a baseline level (assumed for purposes of PTMP financial modeling to be $2 million annually) as a long-term goal. In a national park setting, particularly in this urban area, providing publicly accessible park programs is appropriate. Indeed, many Presidio buildings, some historic, may be suited to and best reused as program venues. Rehabilitating these buildings will be expensive and will require critical investment to help expedite, as one commentor suggests, "the return to active use of buildings in the park." To encourage program uses, the Trust may want to be able either to provide capital funds to rehabilitate the building or to offer funding support to program users. Constraining funding goals to some baseline may limit the extent of public-serving uses or programs in the Presidio, a result the Trust believes is undesirable. Therefore, the Final Plan establishes a goal to increase Trust funding support for park programs over time to $5 million annually, an amount that is still somewhat modest, as recognized by a few commentors who believed a higher goal would have been appropriate given the high cost of establishing and maintaining program uses. See Response PR-5.

PR-21. ***Philanthropic Support***

Many commentors believe that the Trust should not allocate Trust revenues, but instead aggressively pursue funding through philanthropy. ("Funding of these expanded programs should be…financed by outside charitable sources, with no cost to the Trust for either operating or capital costs… The proposed expanded level of programs should not be included in the Trust budget.") They ask that the Plan identify how the Trust intends to raise financial support privately. One individual states that reasonable assumptions of philanthropic revenues should become part of future financial analyses. Another individual offers that "current tax/gift regulations are being eased and this should be attractive to those most capable of donating large sums."

Response PR-21 – In response to comments, the Trust has reduced its annual program funding goal in the Final Plan by $5 million per year. See Response PR-5. The Trust will provide a baseline level of park programming and funding support that may include one-time capital investments for establishing a program venue and/or funding of annual operating costs. Funding is projected to increase gradually from $2 million annually to $5 million annually. The Plan now states that the Trust will actively pursue philanthropic support for both programs and natural resource projects. How the Trust intends to do that, however, is not part of the Plan, which is primarily a land use plan. A variety of funding options will be explored prior to program implementation. It is too early, and would not be fiscally prudent or

conservative at this time, to make "reasonable assumptions of philanthropic revenues" for inclusion in the PTMP financial analyses; thus such assumptions are not included in the financial analysis. (Refer also to Response FI-29.)

PR-22. ***Explaining and Allocating Funds to Programs***

Several commentors seek clarification of how funds would be allocated to programs and ask the Trust to reconcile cost inconsistencies. A neighborhood group asks "Where will the money go? …What mitigations are you going to use to ensure for financial viability of such programs?… How will it be invested? Will it be used for more museums and events that will lose money as the Russian Show did? Who decides these programs?" Another commentor states that the Trust anticipates spending at least $10 million per year on these programs, but the actual annual program expense could be $23 million or much more, depending on which programs are pursued. Another individual tells the Trust that "your program cost of potential programs is $19-$22 million but you only list $10 million in your table and there is no note as to why there is a difference between these two significantly different figures." In light of this uncertainty, the NRDC letter recommends that the Trust explain how the $10 million programming goal was derived and on what it will be spent, since $10 million per year is insufficient to fund the operating and capital costs of all proposed programs, and identify the minimal level of programs that will be covered annually. The GGNRA Citizens' Advisory Commission further recommends that the Trust disaggregate the $10 million (and the 930,000 square feet) proposed for interpretation and cultural/educational programs.

Response PR -22 – There is some confusion on the part of commentors with regard to Table 3.1, Potential Programs, on page 74 of the Draft Plan. This table was intended only as a menu of potential program options that could be considered in the future at the Presidio. The list was not intended to be all-inclusive or prescriptive for Presidio programs. For each program listed, one-time capital costs for set-up and an annual operating cost were cited to give reviewers a realistic idea of how expensive establishing and maintaining program uses can be.

For each of the alternatives studied in the Draft EIS, including the Draft Plan Alternative, different levels of program dollars and program space were assumed and analyzed. The different total funding amount indicated the relative importance of the program component for each alternative. Under the Draft Plan Alternative, $10 million was assumed as the annual cost of programs presented in that alternative; the $10 million estimate was used for purposes of financial modeling for the Draft Plan Alternative. Program costs assumed for other alternatives ranged from $2 million to $8 million in the Draft EIS. In the Final Plan Alternative, the $10 million estimate has been reduced to $5 million and would be achieved over time. See Responses PR-20 and PR-21.

The Final Plan clarifies the Trust's (revised) commitments regarding programs, eliminates Table 3.1, and sets forth overall program goals and objectives. See Planning Principles 11 through 15 in Chapter One of the Final Plan. The Trust will provide a baseline level of park programming and funding support that includes both one-time capital investments as well as annual operating costs. Funds will be allocated as part of the annual budgeting process, which will weigh competing factors associated with the overall Presidio budget and work plan. See Chapter Four, "Resource Preservation and Enhancement: Priorities and Timing" section, of the Final Plan. Presently, both the NPS and the Trust contribute money to Presidio programs. The NPS supports interpretive rangers and visitor center activities through its annual appropriated funds; the Trust contributes funds and resources to interpretive programs as well as the native plant nursery, stewardship and archeology programs, and a limited number of exhibits and events.

The Trust has recently redirected its focus to those programs that create opportunities for visitors to explore the Presidio's history and contribute to its long-term preservation. The Trust plans to expand stewardship, sustainability, and education programs, and will look for innovative ways to bring the history and resources of the Presidio alive for a diverse public. As stated in the Final Plan, the Trust will also strengthen existing partnerships with the NPS and the GGNPA, and engage other organizations as program partners. The Trust is engaged with the NPS in developing an interpretive strategy for the Presidio that will provide some of the framework for future programs. The Trust will also consider an annual public workshop to receive input on programs.

PROGRAM SELECTION

PR-23. ***Program Criteria***

Commentors seek an explanation of the process and specific criteria that will be used to select proposed programs. They ask how tenants and their prospective programs and services would be represented in the marketing of the park, how aesthetic and policy decisions about what groups to support would be made, and who would select the programs. The NRDC letter requests criteria that will be used to establish the number and content of museum programs, and asks whether and how cost and revenue will be factored into the decision, and whether and how the public will be entitled to participate. Others recommend solutions. ("'He who pays the piper calls the tune,' is a position not always consonant with the ideal of free expression on public soil. I strongly recommend that a guiding panel of experts, including some Trust officials, shepherd the selection of Presidio programming, ensuring that the palette broadly speaks to many constituencies, including the Trust's.") The Fort Point and Presidio Historical Association recommends that the Trust consider "identifying a non-governmental, non-profit entity that could effectively coordinate program activities and raise financial support from private philanthropy."

Response PR-23 – With regard to implementation of the PTMP, which will include activities such as tenant selection, program development, additional planning and opportunities for public input in implementation decisions, see Chapter Four of the Final Plan. As stated in this chapter, the level and nature of programming will be influenced by three major factors: (1) the ability of the Trust to generate funds to pay for a program's operating and capital costs, whether through leases of philanthropy; (2) the effectiveness of collaborative efforts between the Trust and the NPS; and (3) the ability of the two agencies to engage other partners. The Final Plan does not specify subject matter or define particular programs because these decisions are highly contingent on interest, availability, partnership opportunities, and internal and external funding, all of which are presently still unknown.

However, the Trust and the NPS are in the process of developing an interpretive strategy for the Presidio that will provide a framework for some program decisions. That planning process has engaged public input through several workshops, and before its completion there will be additional opportunity for public input.

The PTMP is a land use policy plan. It is neither a program-specific plan nor a marketing plan, and therefore does not propose a detailed program budget. Through the course of implementation, costs will certainly be a factor in determining the kinds of programs that the Trust can provide. As stated in the Final Plan, however, the Trust is committed to establishing a core set of programs that it hopes will grow over time. Feasibility studies that explore a variety of funding options will be conducted as part of program implementation. The Trust has not yet investigated the possibility of establishing an external body to oversee philanthropic development, but the Trust will itself begin to explore ways to engage philanthropic support for both programs and resource restoration. The Trust is already engaged with the NPS and GGNPA in joint marketing of Presidio venues, and will evaluate ways to market Presidio programs.

The NRDC recommends that the PTMP include criteria for the number and content of museum programs. Since the PTMP is a general land use plan, it provides the framework for but not the specifics of future decisions that would include museum uses. The PTMP allocates square footages by use category, including cultural uses that could encompass museums, and states a preference for locations for these uses. The Trust believes that museums would be appropriate at the Presidio if they are thematically relevant and financially feasible. See Responses PR-6 and PR-18. The Trust will consider using annual public workshops to engage the public in determining program content and priorities. See Figure 4.3, Public Involvement in Planning and Implementation Decisions, in the Final Plan for more information on additional public involvement opportunities related to implementation of the PTMP.

PR-24. ***Program Plan***

A number of interest groups ask the Trust to develop a park-wide plan for cultural and conference uses. They ask that the plan be completed before demolishing historic or income-producing buildings or commencing any new construction in historically sensitive areas. They recommend that the plan "set goals and identify fund-raising programs and mechanisms to identify how

the Trust intends to acquire funding for programs." Furthermore, they ask that the Trust explain how the public will be an integral part of programming and state the public process for developing the appropriate mix of park programs. ("Given the sensitivity of the issues of cultural diversity and increasing access faced by an urban national park, community input into the programming decisions seems highly desirable.")

Response PR-24 – The PTMP provides the programmatic, park-wide plan for cultural and conference uses requested by commentors. The PTMP envisions that approximately one-third of the Presidio's (Area B) building space would be dedicated to public-serving uses, including educational and cultural programs. The Plan identifies those buildings currently used for cultural purposes and indicates in what districts cultural and educational uses would be preferred. This level of specificity is included in response to commentors' questions and suggestions. See responses to Lodging comments regarding conference facilities.

The PTMP is a general land use policy plan that is the foundation for future planning and decision-making. It does not include building-specific information, such as individual building treatments and uses, but rather provides parameters for future land use decisions. See Responses TP-2 and TP-3. Any future proposed actions that would call for building demolition or new construction will be the subject of additional planning, analysis, and public involvement.

The Trust recognizes the need to develop philanthropic support to enhance programs at the Presidio, and believes that it is more likely to engage long-term program support as it develops a vision for programs and demonstrates the viability of that vision. See Response PR-23 with regard to funding for programs, priority-setting, decision-making, and additional public involvement in programs.

4.21 VISITOR EXPERIENCE AND RECREATION (VE)

CONTENTS

Visitor Experience

VE-1. *Visitation Numbers and Methodology*

VE-2. *General Comments on Visitor Experience Analysis*

VE-3. *Feelings of Overcrowding*

VE-4. *Area A Effects*

Recreation

VE-5. *General Recommendations Related to Recreational Uses*

VISITOR EXPERIENCE

VE-1. ***Visitation Numbers and Methodology***

Various commentors express concern related to the number of visitors projected to visit the Presidio under the various alternatives. Comparisons to the projected 2010 visitation under the 1994 GMPA and other destinations are made. Several commentors, including the Fort Point Historical Society and California Heritage Council, address the methodology used in projecting visitors, including recommended changes, and request that additional explanation of the methodology be provided in the Final EIS. The NRDC requests clarification on the apparent discrepancy between a June 2000 issue of the Presidio Post newsletter which stated that annual visitation at the park is approximately 4 million, and the Draft EIS which indicates that currently visitation is 4.8 million.

Response VE-1 – In response to comments, additional discussion of the methodology used in projecting future park visitors was incorporated into Section 4.4.4 of the Final EIS. The methodology itself was also modified in response to comments, as summarized below. Please note that additional comments regarding the analysis of visitor experience and cumulative effects were also raised, and are addressed below and in the responses to Cumulative Impacts comments.

In determining the methodology to be used in the Draft EIS to project visitors, the Trust first examined the GMPA EIS. As is commonly practiced for other NEPA analyses, the GMPA relied on its traffic model as the basis for projecting visitors. The GMPA analysis used a factor to extrapolate projected visitors from total projected trips to the park. The Presidio Transportation Planning and Analysis Technical Report, the background report for the GMPA traffic analysis, presents these factors for each of the GMPA alternatives. Each GMPA alternative was assigned a unique, gross percentage factor that was applied to weekend and weekday trips to determine projected park visitors. For example, under Alternative A (the preferred GMPA alternative), it was assumed that in 2010, 52 percent of all weekday trips and 66 percent of weekend trips to the park would be made by visitors. By applying these factors to total trips, the GMPA Final EIS predicted that 2010 annual visitation at the Presidio would be 8.4 million (GMPA EIS, page 156).

It is the Trust's understanding that these percentages/factors were generated for each of the alternatives as output of the GMPA traffic model. Because these factors are unique to each GMPA alternative and the corresponding transportation report did not provide background information on how these percentages were derived, it was impossible for the Trust to replicate the visitation methodology using the same basis of percentages/factors. The Trust did, however, use a similar methodology using a percentage of trips generated by a particular land use that are assumed to be made by visitors. By using a unique percentage for each land use, the different mixes of land uses of each alternative yielded a distinct estimate of visitation.

In developing this methodology for the Draft EIS, the Trust paid attention to the CCSF Planning Department's Transportation Impact Analysis Guidelines, Interim Edition (January 2000) as the guidance document. These guidelines provide visitor generation percentages for a variety of land uses, which were then applied to projected trips (similar to the GMPA analysis) to predict future visitation. Overall, the percentages provided in the City's guidelines are notably higher than the gross percentage used in the GMPA analysis. For example, the City's guidelines suggest a visitor ratio of 82 percent for

recreational land uses, 90 percent for lodging and 92 percent for retail. Based on these numbers, the Draft EIS assumed the average visitor ratio for all Presidio land uses would be 67 percent for the No-Action Alternative (GMPA 2000) versus the GMPA (Alternative A) assumption of 52 percent for weekday trips. In fact, none of the GMPA alternatives used a weekday factor above 52 percent. Therefore, the Draft EIS projections provided a higher level of visitation than was assumed in the GMPA EIS.

In response to comments, two primary changes to the methodology used to predict total park visitors were also made. First, cultural and educational uses were separated as educational uses (i.e., schools) would not generate visitors that are typically considered "recreational visitors." (The traffic and related analyses (i.e., air quality, noise, etc.) nonetheless continue to capture these trips for the purposes of adequately assessing the environmental effects of this use.) Second, the Draft EIS included projections for two different types of visitors: recreational and non-recreational. Non-recreational visitors include people coming to the park for non-recreational purposes such as business meetings, deliveries and services. This approach generated confusion for some reviewers, and the NPS requested additional explanation of these numbers in one of their comments. In response to comments, the Final EIS has been revised to provide an estimate of recreational visitors only. Refer to Table 1 and Section 4.4.4 of the Final EIS for additional information.

With regard to the NRDC's question related to existing visitation and the apparent discrepancy between the Draft EIS and the Presidio Post (June 2000 edition), the estimated 4.8 million visitors (for Area A and B combined) presented in the Draft EIS are based on the methodology explained above. Additional clarification and adjustments to the methodology have been incorporated into the Final EIS. It is assumed that the source for the Presidio Post statement from the Trust Executive Director indicating that "about four million people" visit the Presidio each year was a rounded number based on information found in the GMPA EIS which indicated that existing visitation was approximately 3.7 million (GMPA EIS, page 156).

VE-2. ***General Comments on Visitor Experience Analysis***

The NPS provides general comments and recommendations on how the EIS analysis of visitor experience should be expanded, as well as several text changes. A discussion of these comments and the Trust's response is provided below. Detailed comments on specific aspects of the analysis raised by the NPS as well as other commentors, are addressed separately under Responses VE-3 and VE-4.

- The NPS requests that additional information on the current range of visitor experiences and assessment of changes that would be anticipated under the various alternatives be incorporated into the EIS.

Response VE-2 – Both the Affected Environment and Environmental Consequences sections of the Draft EIS were carefully reviewed. In response to the NPS's request, Section 4.4.4 of the Final EIS has been somewhat revised. Section 3.4.4 (Affected Environment), however, continues to provide a comprehensive description of existing interpretation/visitor information facilities; interpretive programs; visitor facilities; park-based programs; and visitor services. The Trust believes supplemental discussion in this section is not warranted.

In revising Section 4.4.4, the GMPA EIS and the Crissy Field Plan EA were consulted as examples of how such changes could be made. The Final GMPA EIS identifies "visitor experience" in the Affected Environment section. However, it does not include this topic in the Environmental Consequences section. Rather, the Final GMPA EIS impact analysis focuses on three underlying topics: interpretation and education, recreation, and scenic viewing. The analysis describes changes in these three topic areas that will occur under each alternative, but no analysis of projected visitation and its impact on visitor experience is provided. Similarly, the Crissy Field Plan EA bases its analysis on current recreational opportunities and the impact of the plan and alternatives on these opportunities without information on projected numbers of visitors or the impact these visitors will have on the overall "visitor experience."

Section 4.4.4 of the Final EIS was revised to clarify the changes in visitor facilities and programs under each alternative, and the role of mitigation measures that will be implemented by the Trust to ensure that future visitation does not jeopardize park resources.

- The NPS also recommends that a carrying capacity analysis which conforms to NPS Management Policy 8.2.1 be undertaken.

Response – Mitigation Measure CO-8 in both the Draft and Final EIS indicate that a carrying capacity analysis will be implemented, as needed based on monitoring of park visitorship. This is consistent with NPS Management Policy 8.2.1 and the approach used for preparation of the Final GMPA and EIS. In fact, Section 8.2 of the NPS Management Policies was the basis for the development of all of the mitigation measures presented in Section 4.4.4 of the Draft and Final EIS.

- The NPS references the range of visitors presented in the summary table of the Draft EIS and states that the visitation levels presented in the Draft EIS could have a noticeable effect on resources and visitor experience.

Response – As described in Response VE-1, several changes to the methodology used to project visitors were made in response to public comments and the Final EIS was updated to reflect these changes. None of the visitorship projections exceed those provided in the Final GMPA EIS for 2010, which did not identify impacts on park resources or the visitor experience. As noted in revisions to Final EIS Section 4.4.4, park visitorship would be disbursed throughout the park, and mitigation measures would ensure that unacceptable impacts would not occur.

- The NPS requests that all references to the possible relocation of the NPS visitor center at the Main Post be removed from the EIS, and that several other edits to the description of the No-Action Alternative (GMPA 2000) be made.

Response – The Final EIS has been revised in response to these requests.

- The NPS questions why the Resource Consolidation and Minimum Management Alternatives would "provide less variety of visitor facilities" than the No-Action Alternative (GMPA 2000), and as such why the Minimum Management Alternative would have greater projected visitation than the GMPA 2000.

Visitor facilities under the Resource Consolidation Alternative would focus on natural resource stewardship and related issues, and thus would have a lesser variety of programs and facilities than other alternatives. The Minimum Management Alternative would devote fewer resources (financial and building space) to programs and facilities. Refer to Response VE-1 for an explanation of how projected visitation was estimated.

VE-3. ***Feelings of Overcrowding***

A number of commentors negatively react to the Trust's admonition in the EIS that peak use could result in feelings of overcrowding among visitors in the Main Post and Crissy Field Planning Districts and note that such feelings should not be elicited in a national park.

Response VE-3 – As indicated in Response VE-1, the methodology for calculating visitors was adjusted in response to comments. Additionally, the text referring to "overcrowding" has been omitted in recognition of the diversity of visitor attractions across the more than 1,400 acres of the Presidio and the likelihood that visitors will be disbursed across that area (i.e., to the golf course, the beaches, the visitor center, and other widely separated attractions).

Nonetheless, the Trust acknowledges that as more people visit the Presidio, both the resources of the park and the quality of the visitor experience can be affected. The principal difficulty lies in determining how much resource or user impact is too much. Given the substantial demand for public use of the park (e.g., witness Crissy Field on a summer weekend), some decline or change in the quality of visitor experience is inevitable in high traffic areas at peak times. However, mitigations in the Draft and Final EIS, including developing and implementing specific, measurable visitor management objectives (see Mitigation Measure CO-9), imposing management controls to ensure that park resources are protected (Mitigation Measure CO-6) and monitoring to determine if and when actions would be needed to keep recreation use at acceptable and sustainable levels (Mitigation Measure CO-8), will ensure that, while conditions for the visitor may diminish in high use areas on occasion (peak use days), the overall quality of the visitor experience and environmental resources will not be affected.

VE-4. ***Area A Effects***

The BCDC requests clarification as to what visitor monitoring would consist of and what would be the result of monitoring if it was determined that Area B uses were negatively impacting Area A. The NPS expresses concern related to lack of specificity regarding development adjacent to Crissy Field (Area A), possible direct and indirect impacts in Area A, and encourages the Trust to conduct a public planning process for Crissy Field (Area B) before long-term leases are executed.

Response VE-4 – The Trust will rely on professional judgment, law and policy, the best available scientific study or research, appropriate environmental review, and other available data in planning for and selecting Area B uses adjacent to Area A. The Trust will seek to attract only those uses appropriate to the purpose for which the park was established. The Trust will not allow uses that would impair park resources or values or would unreasonably interfere with NPS interpretive activities or other existing, appropriate park uses. As future plans are developed for Crissy Field (Area B), the Trust will cooperate with the NPS to the extent practicable to seek consistency with that agency's visitor management policies and procedures and improvements made to Area A. The Trust will also consider the use and enjoyment of Crissy Field (Area A) when determining the appropriateness of future uses. Future environmental review and public comment will play a role in this consideration, although leasing of existing buildings for uses identified as "preferred" in the Final Plan and analyzed in this EIS may not require additional analysis. See Chapter Four of the Final Plan.

The Trust currently imposes management controls within property leases (such as parking restrictions, TDM, compliance with sustainability programs and conservation practices, visitor education, and public access and interpretation requirements) to ensure that the Presidio's resources are protected. As noted by the BCDC in Mitigation Measure CO-8, Monitoring of Visitor Levels, the Trust will monitor visitation levels to ensure that park uses are not cumulatively resulting in unacceptable impacts on Presidio resources, including visitor experience. Monitoring will be conducted by using a number of methods, including visitor and vehicle counts, resource surveys, site inspections, and visual observations. If, as a result of monitoring, it is determined that an ongoing or proposed use would cause unacceptable impacts to park resources, adjustments will be made to the way the use is conducted, including placing limitations on the use, so as to mitigate the unacceptable impacts. This will be committed to and enforced by the Trust as part of its mitigation program and NEPA administrative record.

In response to comments concerning development at Crissy Field, the Final Plan was revised to provide for a decrease in the maximum amount of new construction that will be permitted at Crissy Field (30,000 square feet greater than what currently exists). In addition, the Final Plan also provides more specificity regarding land uses at Crissy Field by stating "preferences" for museum use at the Commissary and Building 640, and for rehabilitation of Stilwell Hall for small-scale lodging. Future planning for Crissy Field (Area B) will involve the public and will also ensure that any enhancements made in Area B will not adversely affect the experience for visitors to Crissy Field (Area A).

RECREATION

VE-5. ***General Recommendations Related to Recreational Uses***

Numerous individuals and groups express opinions regarding existing and planned future recreational facilities and uses within the Presidio. The focus of these comments are on specific recommendations which range from the treatment of play fields (ballfields, soccer, playgrounds, etc.), to dog walking, trails, swimming pools, volleyball courts, use by recreational vehicles (RVs), camping and low cost overnight accommodations within the park. Commentors generally support the PTMP concept for maintaining as much open space as possible for recreational uses and that recreational uses in natural areas should be kept to passive activities such as walking, bird watching, habitat restoration, etc.

Response VE-5 – The Final Plan makes a commitment that the Trust will increase open space to enhance the park's natural, scenic, and recreational qualities; provide for safe and enjoyable recreational use of the Presidio; improve larger open spaces for outdoor activities and play; and provide diverse opportunities for both passive and active recreation. Open spaces will

be restored and expanded for increased visitor use and enjoyment, in balance with resource protection goals.

- *Active Sports Facilities and New Recreational Uses* – Several recommendations are made about the Presidio's ballfields and tennis courts, that in general support maintaining existing fields, increasing the number of fields, and/or concentrating fields in the northern half of the park and removing active sports fields that are in native habitat zones. One commentor recommends the addition of frisbee golf and sand volleyball courts. Other commentors make specific recommendations for recreational uses and activities to be hosted at the Presidio.

Response – The Final Plan makes a commitment to increase and diversify recreational opportunities, from quiet contemplative walks to challenging active sports. See Chapter One, Scenic and Recreational Resources of the PTMP. The Trust is committed to retaining facilities for active recreational uses and will consider additional built facilities, indoors and outdoors, in the future; some existing facilities may be relocated or removed in conjunction with other planning projects. Future planning will further define compatible recreational activities and locations, and will address the potential relocation of existing facilities or construction of new ones, including ballfields.

In the future, the Trust will monitor changing patterns of use and trends in recreational activities and consider what activities are best suited to the Presidio in balance with resource protection goals. Building uses, such as tenants who offer yoga classes and alternative healing techniques, could be considered through leasing opportunities. As an example, the YMCA, which currently manages the Presidio's main post gym and Letterman swimming pool and gym, offers some of these services as part of their overall program.

- *Dogs* – Several commentors raise concerns about current dogs on leash regulations in effect within the Presidio, as part of the GGNRA. Comments request further recognition in the Final Plan that the Presidio functions much like a city park for diverse uses that should be expanded to include off-leash walking, especially at Crissy Field; others requested that the Trust have a strict policy and enforcement program for dogs on leash.

Response – The Trust requirements on dogs in the park mirrors the NPS regulations, which the Trust adopted in 1998. Those regulations require that dogs be on a leash in all national parks where dogs are permitted. Dogs therefore are required to be on leash within Area B. With regard to Area A, which includes Crissy Field north of Mason Street, the GGNRA is currently engaged in a process that could ultimately lead to a rulemaking procedure to develop new pet management regulations for the GGNRA. The Trust is monitoring closely this rulemaking process and will give future consideration to its regulation regarding dogs once the GGNRA rulemaking process is concluded.

- *Trails & Bikeways* – A number of commentors express support for an increase in the number of trails, encouraging people to walk or ride bikes within the Presidio, and one commentor suggests that mountain bikes should be allowed to share off road multi-use paths with pedestrians.

Response – These recommendations are being considered and evaluated in the Trails and Bikeways Master Plan and EA, a separate public planning and environmental review process focused on park-wide pedestrian and multi-use trails and bikeways. The trails planning effort is being led jointly by the NPS and the Trust to ensure that a comprehensive approach to trail and bikeway management is provided for the Presidio. Visitor surveys and public scoping efforts conducted for the trails and bikeways planning effort yielded similar comments, and public involvement will continue to play an important role in the shaping and refinement of the various alternatives. The Trails and Bikeways Master Plan and EA will be released for public review and comment later this year.

- *Camping/RVs* – Some commentors recommend that the Trust provide a full range of overnight accommodations for visitors, including low-cost facilities such as tent camping and a park for RVs. Another commentor opposes the idea of an RV park at Crissy Field.

Response – The Final Plan provides for a limited amount of overnight accommodations, or lodging, to be primarily located within historic buildings. Dorm-style accommodations could provide affordable options, such as youth and elder hostels. Small inns and bed and breakfast accommodations would also be a suitable use of some of the Presidio's historic buildings. The Final

Plan also calls for the retention and enhancement of Rob Hill campground, a group camping facility, in the South Hills district. This campground will continue to be a group campground facility. Additional campgrounds could be considered in the future, possibly including a limited number of spaces for use of smaller recreational vehicles. No "RV park" or large area set aside for use by recreational vehicles has been identified in the Plan due to land use constraints and concerns about potential inconsistencies with the NHLD, other park resources and possible effects on the visitor experience.

Windsurfing Access – One commentor asks what can be done to maintain access for windsurfing.

Response – This access is provided through Area A of the Presidio (i.e., the coastal areas) which is and will continue to be managed by the NPS and is outside the Trust's jurisdiction.

4.22 TRANSPORTATION AND CIRCULATION (TR)

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TR-1. ***Caltrans Encroachment Permit***

Caltrans notes that the Trust should apply for an encroachment permit for any work or traffic control within the State's right-of-way.

Response TR-1 – The Trust appreciates the reminder. Prior to doing any work within the State's right-of-way, the Trust will acquire an encroachment permit from Caltrans.

TR-2. ***Cumulative Traffic Volumes***

The CCSF Planning Department and several individuals suggest that the EIS does not clarify the contribution of the Presidio land use alternatives to the cumulative traffic volumes and identified transportation effects, particularly for intersections outside the Presidio's boundaries. Commentors also request that the source of cumulative traffic volumes be explained, particularly with respect to assumptions for the Doyle Drive project, inclusion of Letterman Digital Arts Center (LDAC) projected traffic volumes, and distinction between traffic associated with the Presidio land use alternatives and other regional growth.

Response TR-2 – AM and PM peak hour traffic volumes in 2020 were based on a combination of projected land uses, including the LDAC, and assumed growth rates from existing traffic volumes. First, the expected increase in employees, residents and visitors associated with land uses throughout the park for each alternative was calculated and converted to traffic volumes. Then, the existing cut-through traffic was assumed to increase to between 40 and 51 percent of the total weekday traffic volume at Presidio gateways, based on trip pattern data obtained from the San Francisco County Transportation Authority (SFCTA) Travel Demand Model. Finally, for external intersections, or intersections beyond the Presidio's boundary, traffic turning movements not entering or leaving the Presidio were assumed to annually increase 6 percent in the AM peak hour and 11 percent in the PM peak hour. These growth rates are based on data from the SFCTA Travel Demand Model. The same travel demand forecasting model is also being used in the analysis for the Doyle Drive Environmental and Design Study, thereby providing consistency between the two projects.

Overall traffic volumes in the cumulative condition thus include traffic projected as a result of employment and population growth in the City as a whole and not just that associated with the Presidio. At the gateway intersections, the PTMP alternatives would contribute 4 percent to 16 percent to the total 2020 AM peak hour traffic volume and 4 percent to 17 percent to the total 2020 PM peak hour traffic volume. The PTMP Background

Transportation Report has been revised to include the project's contribution to cumulative traffic volumes and growth in traffic volumes.

TR-3. ***Geographic Distribution of Cumulative Traffic***

The CCSF Planning Department, the SFCTA, and others request more detailed information regarding the geographic distribution of Presidio-based trips. Commentors also suggest changes to figures in the Draft EIS.

Response TR-3 – The distribution of AM and PM peak hour traffic is based on data from the SFCTA's Travel Demand Model. The distribution of traffic to the Presidio gates during the PM peak hour is shown in Table 4-1 of the PTMP Background Transportation Report. Table 4-1 also indicates the percentage of PM peak hour traffic at each gate expected to be cut-through traffic. This information is summarized below for the No-Action and Final Plan alternatives.

During the PM peak hour, 51 percent of the total gateway traffic is expected to be comprised of cut-through traffic with the No Action Alternative (GMPA 2000). With the Final Plan Alternative, 43 percent of the 2020 PM peak hour gateway traffic is expected to be cut-through traffic.

Figure 1 in the Final EIS has been changed to correctly label I-680. Figure 27 in the Final EIS has also been corrected. Figure 31 in the EIS has been revised to show Golden Gate Transit (GGT) routes as well as Muni routes and to show the locations of Muni and GGT bus stops within the study area.

TR-4. ***Weekend Analysis***

The CCSF Planning Department, the SFCTA, and others suggest that analysis of weekend traffic conditions should be included in the Final EIS, based on the combined trips to Area A and Area B. Commentors cite Table 3-7 in the PTMP Background Transportation Report as indicating a higher number of weekend person trips than weekday person trips.

Response TR-4 – Peak hour weekday conditions were used because an analysis of peak hour weekday conditions provides a more conservative analysis than peak hour weekend traffic conditions. (In other words, it is the time of greatest impact.) This is because the total number of daily vehicle trips made on a weekday by employees, residents and visitors is expected to be greater than that on a weekend day. This assumption is consistent with the analysis and findings of the 1994 GMPA (Presidio Transportation Planning and Analysis Technical Report, July 1994, page IV-62).

In addition to total weekend daily traffic volumes being less than total weekday daily traffic volumes, weekend traffic volumes are less concentrated within a given time period and are more dispersed throughout the day. Weekday traffic volumes tend to be concentrated in the commute periods, yielding the highest hourly traffic volumes during the peak hour of the morning and afternoon commute periods (typically around 10 percent of the daily total traffic). Thus, the traffic analysis for the EIS was based on the highest expected hourly traffic volumes, which occur during weekday commute periods. The EIS analyzed study intersections during both the AM peak hour and PM peak hour.

Table 3-7 of the PTMP Background Transportation Report to the Draft EIS was entitled "Existing and Future (2020) External Daily Person Trips to Area B by Alternative." However, this table includes visitor trips only, or excludes resident trips and employee trips, as described in the preceding paragraph. The title of the table has been revised to read, "Existing and Future (2020) External Daily Visitor Trips to Area B by Alternative."

TR-5. ***Implementation of Mitigation Measures***

The CCSF Planning Department and other commentors express concern that the Trust does not have the ability to implement mitigation measures for traffic impacts outside the Presidio's boundaries, as some of these intersections are outside the Trust's jurisdiction. Commentors also request that the Final EIS describe the phased implementation of mitigation measures, and how these mitigation measures will be coordinated with development of the LDAC and the reconstruction of Doyle Drive. The CCSF Planning Department also comments "The last sentence of the fourth paragraph on page 319 states that 'The existing roadway between Gorgas Avenue and Lyon Street would be reconstructed as a one-way roadway.' Is this roadway under the jurisdiction of the Presidio?"

Response TR-5 – The ability of the affected roadways to carry the forecasted traffic volume is estimated by means of the intersection operational analysis.

Intersections expected to operate at substandard levels of service (LOS E or F) in 2020 identify locations where the transportation network would need to be improved unless increased trip reduction measures should be implemented to decrease traffic volumes.

The traffic mitigation measures identified in the EIS address the cumulative effects of Area A and Area B (including LDAC), other growth in San Francisco and the reconstruction of Doyle Drive. The Trust will monitor traffic volumes, and.as critical turning movements at the study intersections approach a point that would cause the level of service at the affected intersection to deteriorate to LOS E or F, the Trust will either implement the measure identified in the EIS, or coordinate with the San Francisco Department of Parking and Traffic or the NPS to implement the mitigation measure. Where intersections fall outside the Trust's jurisdiction, the decision to implement the identified mitigation measure cannot be made by the Trust. Through coordination with agencies with jurisdiction, the Trust and those agencies would determine their respective contributions to the cost of implementation.

The Trust has been working collaboratively and successfully with the City and State on projects addressing intersections outside control of the Trust. For example, the Letterman Complex Final EIS identified major intersection changes at Richardson Avenue (U.S. Highway 101) and the Trust is currently implementing this project with those two agencies.

The proposed reconfiguration of the roadway between Gorgas Avenue and Lyon Street is within Presidio property, and the proposed change from two-way operation to one way has been shown to not negatively affect the operation of the intersection of Lyon Street/Francisco Street.

TR-6. ***Level of Detail and Indirect Consequences of Mitigation Measures***

The Golden Gate Bridge Highway and Transportation District (GGBHTD), the Cow Hollow Neighbors in Action and other commentors suggest that the EIS include more detail on the transportation improvements needed to support the Presidio land use alternatives. The CCSF Planning Department submits that some of the described traffic mitigation measures have consequences that are not fully addressed in the EIS, such as removal of on-street parking to provide a turn lane that would mitigate the operation of an intersection. One commentor suggests that traffic signals do not mitigate an increase in traffic volume and the corresponding effect on noise, air quality and effects on the surrounding neighborhoods. The same commentor also submits that traffic signals would increase the speed of vehicles entering the park.

Response TR-6 – The mitigation measures identified in the Draft EIS include improvements to key intersections that would effectively enhance the operation of the study intersections as described in the EIS, given each alternative's land use scenario. As more buildings are occupied, and as cut-through and background traffic volumes grow, the Trust will work with the City, the NPS and the GGBHTD to implement planned improvements to the transportation network when needed.

The EIS has been revised to address the potential effects of proposed mitigation measures, including the number of parking spaces that need to be removed in order to provide turning lanes and the effects of signaling intersections and Presidio-generated traffic on other nearby intersections. The number of study intersections has been expanded to include other intersections that could potentially be affected in a similar manner as those included in the initial study. As a result of expanding the number of study intersections, four additional mitigation measures were identified.

In many cases, traffic signals would mitigate the operation of study intersections to an acceptable level by reducing overall delay for motorists. Reduced delay for motorists at the study intersections would mean that automobiles would spend less time idling in queues, and therefore would yield improved air quality and less noise pollution. Traffic signals accommodate vehicular traffic more efficiently than STOP signs because they can adapt to changes in travel patterns and traffic conditions that occur throughout the day. Speeds would not increase substantially, although some traffic would not need to stop at the signal and would be able to maintain speed passing through the intersection.

TR-7. ***Proximity to Golden Gate Bridge***

The GGBHTD states that the PTMP lacks detail on how it will incorporate in its transportation and land use plans the challenges and opportunities of its proximity with the Golden Gate Bridge.

Response TR-7 – Proximity of the Presidio to the Golden Gate Bridge poses challenges and opportunities today, as it will in the future. Proposed land uses would not change the situation, and transportation investments are intended to ensure efficient access for all modes of transportation throughout the park. The Trust will continue to work with the GGBHTD and Caltrans to facilitate traffic flow on Doyle Drive and Park Presidio/Veterans' Boulevard and minimize cut-through traffic on Presidio roadways.

TR-8. ***Presidio Employee and Resident Transportation Needs***

The GGBHTD notes that the PTMP will cluster housing close to work and major activity areas, asks how residents' and employees' circulation needs will be met, and asks if the internal shuttle, bicycling and walking will be the primary modes for internal trips.

Response TR-8 – In addition to improving roadways and intersections to carry the expected amount of traffic, the Trust will continue to provide internal shuttle bus service and improve bikeways and trails to make alternative modes of transportation more viable for travel to and within the Presidio. As noted by the commentor, many land uses of the Plan are well suited to non-automobile modes. The jobs-housing balance and clustering of housing with employment and other activities as described in the PTMP would help to reduce traffic and pollution and improve park operations, transit, and community policing. Bicycling, walking and internal shuttle bus service are expected to be significant modes of travel for trips internal to the park. The Transportation Demand Management (TDM) Program encourages Presidio residents and employees to carpool, ride transit, bicycle and walk.

TR-9. ***Further Mitigation for Lincoln/Merchant Intersection***

The GGBHTD requests that the Trust identify further measures, if available, to improve traffic operations at the Lincoln Boulevard/Merchant Road intersection.

Response TR-9 – Mitigation for the intersection of Lincoln Boulevard/Merchant Road includes a traffic signal and realignment of the intersection where needed. The Trust believes that these improvements will substantially improve traffic operations at this location. As stated in the EIS, this mitigation measure may not be warranted for several years. The Trust plans to implement interim changes to improve the safety of this intersection.

TR-10. ***Travel Demand Assumptions***

The CCSF Planning Department requests that the EIS clarify assumptions used in the transportation analysis, including trip generation rates, jobs-housing balance and associated number of household work trips assumed to be internal to the Presidio, mode split, parking turnover rates and TDM program. The CCSF Planning Department also questions why its assumptions for many of these factors were not used.

Response TR-10 – The trip generation rates used in the transportation analysis were based on rates from various entities, including the City, Caltrans, and San Diego. The rates represent reasonable assumptions based on the likely employee densities and land uses proposed for the Presidio. The short-term parking turnover rates are based on turnover rates used for projects within the City and turnover rates used in the GMPA. The Trust has surveyed Presidio employees and residents to determine the current mode split, and the latest survey results indicated that the automobile/transit/other mode split for residents and employees is 67 percent/20 percent/13 percent and 71 percent/16 percent/13 percent, respectively. These surveys were conducted before the implementation of the internal shuttle bus service. As more buildings are occupied, and the TDM Program is advanced and parking fees are implemented, the future mode split is expected to yield more individuals shifting from automobile use to transit, bicycling and walking. The mode split provided on page 321 of the Draft EIS (63 percent auto, 20 percent transit and 17 percent bicycling/walking) is a composite of daily mode splits for all land uses.

The Presidio's live/work model strives to achieve a balance of people both living and working in the Presidio. The jobs-housing balance varies by alternative, with more balanced conditions under the Final Plan Alternative with a jobs-housing balance of 87 percent (i.e., 87 Presidio residential units for per 100 Presidio employees that would be willing and able to live in the Presidio). Currently, approximately 35 percent of Presidio households have at least one Presidio employee. By 2020 with the Final Plan Alternative, 2,060 of the 3,770 Presidio residents are expected to work in the park. About 29

percent of all household weekday trips of the Final Plan Alternative are assumed to be internal to the Presidio.

The Presidio's unique community environment, live/work model, and proposed mix of complementary land uses warrant separation of trips into internal and external trips. Internal trips, or trips that begin and end within the Presidio, are likely to have a different mode split than external trips (trips that begin in the Presidio and end outside the Presidio or begin outside the Presidio and end in the Presidio). For external trips, the number of trip ends corresponds to the number of trips, as opposed to internal trips where two trip ends represent one trip. Therefore, a reduction factor of two was applied to the number of the internal trip ends to avoid double-counting trips. For instance, if an individual lives and works within the Presidio and makes a trip from home to work, both the trip end generated by the person's home as well as the trip end attracted by the person's workplace would represent the same trip. A different internal trip percentage factor was applied to each land use category, with the resulting composite reduction being determined by the mix and intensities of land uses in each alternative. The resulting reduction factors ranging between 11 percent and 16 percent are deemed appropriate for the Presidio's expected community environment and planned live-work model.

The Trust's conservative motor vehicle trip reduction assumptions are associated with the commitment to implement an extensive TDM program including parking fees, an internal shuttle bus to provide transit services within the park, and required participation by tenants including specific trip reduction goals. It is not unreasonable to assume the success of this program to shift vehicle trips to other modes due to the incentives and disincentives of the program. U.S. studies have demonstrated that paid parking alone can reduce drive-alone commuting between 17 percent and 44 percent (average 25 percent) and the number of cars driven to work by between 14 percent and 28 percent (average 19 percent). In this manner, the PTMP analysis is also consistent with GMPA transportation analysis which shifted vehicle trips to transit due to the proposed TDM program, and with analyses undertaken by the City for reuse of the Hunters Point Shipyard.

TR-11. ***Traffic Analysis: Existing Conditions***

The CCSF Planning Department submits that the Final EIS should explain why the findings of the traffic analysis for existing conditions differ from the findings of the 1994 GMPA EIS, particularly at the intersections of Richardson/Lombard and Doyle/Marina/Lyon.

Response TR-11 – Table III-2 of the Presidio Transportation Planning & Analysis Technical Report: A Supplement to the GMPA indicated that the intersection of Doyle Drive, Marina Boulevard and Lyon Street operates at an overall LOS E during the PM peak hour. The traffic volumes used in the analysis for the GMPA were gathered in 1991, whereas traffic counts used for the PTMP were gathered in 2000. Traffic count data collected at this intersection throughout the years since 1991 have shown that the amount of traffic on the westbound through movement during the PM peak hour has decreased substantially, most likely due to the installation of STOP signs on Marina Boulevard in late 2000 and early 2001. The lesser PM peak hour westbound volume at this location yields a much-improved level of service at the intersection.

The intersection of Mason Street/Marina Boulevard/Lyon Street/Doyle Drive is actually two intersections that are within close proximity and have two different kinds of traffic control devices. The intersection of Doyle Drive/Lyon Street/Marina Boulevard is signalized and was analyzed with the appropriate methodology for signalized intersections as outlined in the Highway Capacity Manual. The intersection of Mason Street/Marina Boulevard/Lyon Street is an unsignalized intersection with Lyon Street being STOP-sign controlled, and was analyzed accordingly.

The GMPA indicated that the intersection of Richardson Avenue/Lombard Street carried 3,137 vehicles on the southbound approach during the AM peak hour in July 1991. Traffic counts collected for the Draft EIS indicate that the volume of traffic in this direction in the AM peak hour was 2,653 vehicles per hour in May 2000. However, traffic counts collected in 1999 for the Letterman Complex Final EIS measured 2,903 vehicles per hour in this direction. Therefore, the Final EIS has been revised to assume the higher volume of 2,903 vehicles per hour in the southbound direction during the AM peak hour for existing conditions. Analysis of the intersection in 2020 assumes a growth rate from the higher southbound traffic volume. The poor level of service on this approach is what resulted in an overall LOS E in the 1994 GMPA. With the volume reduced to its current level, the level of service for the intersection improves. However, the critical left-turn movement on Lombard Street westbound continues to operate at LOS F and is

a critical constraint. This is being mitigated in the short-term by a new intersection at Richardson Avenue and Gorgas Avenue (Mitigation Measure TR-1 in the Letterman Complex Final EIS), and in the long-term by the Doyle Drive project.

TR-12. ***Traffic Safety***

A few commentors, including the San Francisco Bicycle Coalition, suggest that the Trust should implement traffic calming measures and other engineering solutions to manage traffic within the park.

Response TR-12 – Although this issue is not directly addressed in the Plan, the Trust continuously plans and implements changes to the Presidio's roadway system to calm traffic and improve safety conditions for vehicles, bicycles and pedestrians. Community input for such changes is solicited as part of the planning process for those improvements. The commentors are referred to the transportation section of Chapter Two of the Final Plan for further discussion.

TR-13. ***Construction Traffic***

The GGBHTD suggests that the Final EIS should identify what impacts, if any, are expected from the increase in construction vehicle traffic near the Golden Gate Bridge Toll Plaza.

Response TR-13 – The construction vehicle traffic associated with rehabilitation or new construction in the Presidio would likely use the Golden Gate Bridge Toll Plaza to access the Golden Gate Bridge. The proposed Construction Traffic Management Plan (Mitigation Measure TR-26) would include measures to mitigate any potential impacts. The Construction Traffic Management Plan would include information on construction phases and duration, scheduling, proposed haul routes, permit parking, staging area management, visitor safety, detour routes, and pedestrian movements on adjacent routes.

TR-14. ***Study Intersections for Traffic Analysis***

The SFCTA and the CCSF Planning Department suggest that future intersections with Girard Road should be analyzed in the Final EIS traffic analysis since the proposed reconfigured Doyle Drive would have access from Girard Road.

Response TR-14 – Girard Road and intersections with Girard Road in the vicinity of Doyle Drive are being analyzed as part of the Doyle Drive Environmental and Design Project since the operation of intersections along Girard Road will largely depend on the design of the proposed interchange at Girard Road. The Doyle Drive Environmental and Design Project has included the land use assumptions identified for the PTMP, which will allow for the identification of needed improvements on Girard Road. Since the intersection of Girard Road and Lincoln Boulevard will operate largely independent of specific Doyle Drive design features, the Final EIS has added analysis of this intersection. As indicated in Tables 46 and 47 in Section 4.5, the intersection would operate at LOS B in both the AM and PM peak hours after mitigation.

TR-15. ***14th Avenue Gate***

The Planning Association for the Richmond questions the proposal to reopen the 14th Avenue Gate to vehicular traffic.

Response TR-15 – The 1994 GMPA recommended reopening the 14th Avenue Gate to automobile traffic and operating the 14th and 15th Avenue gates as a one-way couplet (14th Avenue inbound/15th Avenue outbound), and thus, this configuration constitutes the future No Action condition. However, in response to neighborhood requests, the Trust is committed to analyzing various alternatives for the potential opening of the 14th Avenue Gate. These alternatives will be reviewed with community groups and the San Francisco Department of Parking and Traffic. Any proposals for changes from the existing condition would be presented to neighborhood groups by the Trust, and since these changes would primarily be on City property, would have to be approved by the City as well as the Trust.

TR-16. ***Effects of Additional Traffic on Surrounding Neighborhoods***

Several residents in neighborhoods surrounding the Presidio express concern that the increase in traffic traveling to and from the Presidio would threaten the stability of the buildings in the neighborhoods and exacerbate the already congested traffic conditions in their neighborhoods. One commentor claims

that the pavement section of 15th Avenue could not withstand the traffic volume currently generated by the Jewish Community Center (JCC) that travels through the 15th Avenue Gate.

Response TR-16 – In most cases, any increased delay or deterioration of intersection level of service due to the additional traffic generated by the EIS alternatives would be adequately mitigated by the mitigation measures presented in the EIS. These mitigation measures would ensure that the operation of the intersections is maintained at an acceptable level of service as determined by the City and that traffic delays are not excessive. The unmitigable operating conditions at three study intersections would occur as a result of cut-through traffic and regional traffic growth as well as the PTMP EIS alternatives.

The stability of buildings and pavement wear are functions far more related to the weight of vehicles than to their volume. Implementation of the PTMP will not substantially increase heavy vehicle traffic on internal or nearby streets. The 15th Avenue Gate has virtually no heavy vehicle traffic. Currently, traffic traveling through the 15th Avenue Gate is comprised of traffic traveling to and from the Public Health Service Hospital (PHSH) area, other areas of the park, and cut-through traffic. The Trust plans to reoccupy the PHSH area sometime in the future, and traffic volumes through the 15th Avenue Gate are expected to increase from current levels. After discussions with members of the residential neighborhood outside the 15th Avenue Gate, the Trust agreed to limit the amount of JCC traffic traveling through the 15th Avenue Gate as part of the JCC's TDM program. Since then, the Presidio Trust has monitored traffic traveling to and from the JCC, and found that JCC is complying with the limitations. The Trust is responsible for maintenance of pavement within the boundaries of the park; pavement outside the Presidio's boundary is the responsibility of the San Francisco Department of Public Works.

The Trust considers the 15th Avenue Gate a minor entrance/exit to the park. The Trust actively works to limit traffic utilizing this gate. However, the PHSH area is a part of the Presidio and access to and from the area via Battery Caulfield will be maintained.

TR-17. ***Prevention of Traffic from Using Recreational Routes***

The CCSF Planning Department and San Francisco Tomorrow request that the Final EIS discuss specific steps to prevent Presidio and cut-through traffic from using shoreline recreational routes (i.e., Marina Boulevard).

Response TR-17 – The amount of traffic expected on Marina Boulevard in the future will be largely be determined by the design alternative chosen for the reconstruction of Doyle Drive. The provision of an interchange on Doyle Drive at Girard Road will dramatically improve traffic access routes to the Presidio from the east, reducing traffic volumes through the Marina Gate, which would likely be used primarily by those traveling to Crissy Field (both Area A and Area B).

Cut-through traffic at the Presidio is detrimental to the park, and not just to shoreline areas. Although the Trust will attempt to curb cut-through traffic in the Presidio that should be utilizing other facilities, the use of park roads as cut-through routes is likely to continue. Park roads will be managed to provide access to park sites rather than accommodate cut-through traffic.

TR-18. Mason Street

The Golden Gate National Parks Association (GGNPA) and others suggest that the Trust consider moving Mason Street to the south to remove a physical barrier between Crissy Field and the Crissy Field Center.

Response TR-18 – The Trust is aware of this issue and will continue to coordinate with the GGNRA and the GGNPA to study the feasibility of routing traffic off Mason Street. Finding the most appropriate solution will require a detailed alignment study that is beyond the scope of this programmatic EIS. Potential solutions will be studied in the future, as indicated in Chapter Two of the Final Plan.

TR-19. ***Access to Palace of Fine Arts***

The Exploratorium and another commentor request that the PTMP include a safer and more direct connection between the Exploratorium/Palace of Fine Arts and the Presidio.

Response TR-19 – The Trust is currently in the final design stages for a new signalized intersection on Richardson Avenue that is farther northwest of the existing intersection at Francisco Street. The new intersection will provide a shorter crosswalk across Richardson Avenue at Lyon Street, substantially improving the pedestrian connection between the Palace of Fine Arts and the Presidio. The new intersection is part of Mitigation Measure TR-1 from the Letterman Complex Final EIS; construction is expected to be completed by December 2002. The Doyle Drive Environmental and Design Study team is also considering improved vehicular access to and from the Palace of Fine Arts as part of the Doyle Drive Environmental and Design Study EIR/EIS.

TR-20 ***Need for a Helipad***

The San Francisco Medical Air Access Project is concerned that the PTMP does not address the issue of a medical helipad at the Presidio. ("For those of us who provide care to victims of critical illness and injury and in concern for the patients we serve, we are aware of the need for a helipad in this location and believe that the absence of any viable alternative has created a safety issue.")

Response TR-20 – This concern is acknowledged. The GMPA states "the helipad [at Crissy Field] will be retained for military use, disaster relief, and emergency medical transport, but it may be moved to another location on the former airfield…" (page 89). Following adoption of the GMPA, the Crissy Field Plan included a provision for an emergency helicopter landing site to be built within the grassy knoll of the field in the original site. However, the NPS chose not to include a helipad in the final design of Crissy Field (Area A), either for medical transport or for emergencies.

There may not be other locations outside the historic airfield where a helipad can be safely accommodated without affecting the historic integrity of the National Historic Landmark District or the visitor experience. Nonetheless, the Trust would like to coordinate with the commentor to determine whether there may be suitable landing sites for use during disasters (such as an earthquake). Physical and operational requirements for the type of facility required for more frequent use would require a comprehensive needs assessment and detailed feasibility study. Such a study should assess sites outside the Presidio, closer to area hospitals.

4.23 TRANSIT SERVICES (TN)

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TN-1. *Transit Service Improvements*

Several commentors, including the City and County of San Francisco (CCSF) Planning Department, the GGNRA Citizens' Advisory Commission, San Francisco Beautiful and Urban Ecology, suggest that the Trust make a stronger commitment to seeking improved transit service to the Presidio. The CCSF Planning Department suggests that fast and efficient transit service to key City, downtown and regional transit connection destinations that outperforms the automobile is a key mitigation for potential impacts from the projected large Presidio employment base. The CCSF Planning Department specifically suggests express transit service to downtown to connect to the Transbay Regional Transit Center, Ferry Building and BART as well as to Golden Gate Transit service. San Francisco Beautiful and Urban Ecology support extension of the historic streetcar to Fort Mason, and suggest that the Plan ensure the opportunity to extend that service through the densest portions of the Presidio and to the Golden Gate Bridge. The GGNRA Citizens' Advisory Commission urges the adoption of an aggressive mass transit plan that includes the E-line, ferry service and buses.

The Golden Gate Bridge Highway and Transportation District and Cow Hollow Neighbors in Action suggest that the Plan identify what specific transit improvements are being contemplated by the Trust. Several commentors have specific suggestions for improving transit service to, from and within the Presidio, including:

- Operating the Muni #28 route on Lincoln Boulevard and other surface streets in the park rather than Doyle Drive;
- Terminating the Muni #41, #45 and #30 lines at the Letterman Digital Arts Center rather than Cow Hollow (#41 and #45) and the Marina (#30);
- Operating Presidio shuttle buses to connect with BART and CalTrain during peak commute hours;
- Providing shuttle service for business and public use, as well as increasing access to public transit;
- Providing direct transit service between the most urban areas of the City (e.g., Hunters Point) and the Presidio to provide children in these neighborhoods access to natural resources;
- Studying the potential for using existing nearby piers for passenger ferries;
- Reusing the remnants of railroad tracks between Fort Mason and the Presidio with some sort of public transit; and
- Considering building underground parking structures connected underground by a horizontal tram with direct access to Doyle Drive.

Response TN-1 – The Trust will continue to support the use of public transit by employees, residents and visitors, and will continue to work with MUNI and GGT to make improved transit service a reality. Planning of specific transit improvements is outside of the sole authority and responsibility of the

Trust and hence cannot be proposed as part of the Plan. The Trust supports several transit improvements being considered by Muni and GGT, and as indicated in Chapter Two of the Final Plan will continue to work with the relevant transit agencies to upgrade service to the Presidio as the on-site population increases. Improved express bus connection to downtown San Francisco and BART is an important service upgrade supported by the Trust. This may include modifications to the existing Muni 82X line, which provides service to and from downtown San Francisco, BART stations on Market Street, the Transbay Transit Terminal and the CalTrain Depot during morning and evening commute periods. The Trust is also in favor of and will work towards modifying existing operating rules that apply to transit providers from outside San Francisco such as GGT, so that their current bus service to and from downtown San Francisco can be used for travel within the City, including trips between the Presidio and the downtown area. Furthermore, Mitigation Measure TR-10 calls for supporting increased service frequency on existing Muni lines as warranted. The Trust will work with Muni to determine the most cost-effective service plan.

The Trust also supports extension of the proposed Muni streetcar E-line from Fisherman's Wharf to Fort Mason, and will continue to support the E-line extension beyond Fort Mason to the Presidio. The Trust participates actively on a committee that is working toward implementation of the E-line extension.

As described in the Trust's Transportation Demand Management (TDM) Program (included as Appendix D in the Final Plan), shuttle service internal to the Presidio and connecting to transit service immediately outside the Presidio is a critical component of an overall strategy to increase transit use and decrease automobile traffic. This shuttle service is already provided, and will serve increasing numbers of residents, employees, and visitors over time. Supplemental shuttle service from the Presidio to downtown transit connections is a feature of the TDM program which the Trust anticipates will be implemented in conjunction with Presidio employers in the future. The Trust currently makes its shuttle vehicles available to school and community groups upon request, and would support other options, if feasible, to connect the Presidio to populated areas south of downtown.

TN-2. ***Transit Service to Crissy Field***

Several commentors, including the Golden Gate National Parks Association, request that the Trust seek ways to provide superior public transit and specialized transportation services to Crissy Field.

Response TN-2 – In July 2001, the Trust implemented internal bus shuttle service that directly serves Crissy Field in the Presidio. The Trust has recently altered and improved the Presidio shuttle bus service based on field observations and a survey of shuttle riders and Presidio tenants conducted in late 2001. The revised route(s) provide additional service to Crissy Field. Furthermore, the Trust has proposed a transit hub at the foot of the Main Post. The transit center would serve a variety of Muni lines and the Presidio's shuttle bus service. The proposed location of the transit center is very near Crissy Field, providing its visitors with easy access to transit service. The planned provision of transit service at or near Crissy Field has been coordinated with the NPS and the Golden Gate National Parks Association.

TN-3. ***Presidio Internal Shuttle Service***

Cow Hollow Neighbors in Action requests that the Trust clarify whether the Presidio's shuttle bus will provide direct access to transit services outside the Presidio's boundaries.

Response TN-3 – In July 2001, the Trust implemented the Presidio internal shuttle bus service (recently named PresidiGo), and is committed to its continued operation in the future. The Trust recently altered and improved PresidiGo service based on field observations and a survey of shuttle riders and Presidio tenants conducted in late 2001. One of the new PresidiGo routes extends beyond the Presidio's boundary outside the Arguello Gate to provide more convenient links to local transit services currently operating on California Street. This service was coordinated with the Presidio Heights Association of Neighbors (PHAN) and Muni, both of which support the new service. The Trust will continue to look for improved connections with other transit services within and surrounding the park. When looking to implement connections outside of the Presidio, the Trust will coordinate with associated neighborhood organizations and comply with City restrictions for large vehicles on neighborhood streets surrounding the Presidio. In addition to the

PresidiGo route, the Chestnut Street lunch shuttle buses also currently connect with other transit routes outside the park gates.

TN-4. ***Support of Transit Hub***

Several commentors, including the CCSF Planning Department, Planning Association for the Richmond and the Sierra Club, comment that the Trust should commit to and clarify plans for a transit hub. The Sierra Club supports a transit hub that allows for convenient connections between Presidio internal shuttle buses, Muni buses and GGT buses, and suggests discontinuing the Presidio's proposed transit center if the Doyle Drive transit becomes a reality and provides equal or better service. The CCSF Planning Department questions why a transit hub is shown in the Draft Plan but not mentioned in the Draft EIS, and requests clarification of the Trust's plans for and commitment to the transit hub. The CCSF Planning Department also writes "The Trust has indicated that it would provide shuttle service from recreation areas to SF attractions. What will be the extent of this service in terms of frequency, headways, and projected ridership? How will the service be coordinated with MUNI? What will be the impacts of this service on adjacent neighborhoods?"

Response TN-4 – The Trust has proposed a transit hub at the foot of the Main Post that is expected to accommodate several Muni lines and the Presidio's internal shuttle bus service. The transit hub is proposed for the northern end of the Main Post, near Crissy Field and Letterman, thus encouraging transit ridership to these districts. Transfers to and from GGT will remain at the Golden Gate Bridge Plaza and the bus stops on Richardson Avenue at Francisco Street. The Trust will continue to improve shuttle bus connections to and from these locations and the Presidio. The Final EIS analyses of transit services includes the transit center and the text has been revised to include a discussion of the proposed transit center, which was also proposed in the GMPA and thus, analyzed in the GMPA EIS.

In addition, the San Francisco County Transportation Authority (SFCTA) plans a transit center in the Doyle Drive corridor that would facilitate transfers between the bus services. The Trust does not believe that such a transit center should replace the proposed transit hub at the foot of the Main Post because the Doyle Drive facility would be located too far from the population concentrated in the Main Post district, the central area of activity of the Presidio. Nonetheless, the Trust expects that the PresidiGo would serve the Doyle Drive transit center as well as the Main Post location.

The Golden Gate Concourse Authority is examining a "cultural shuttle" service would serve Golden Gate Park, the Presidio and other GGNRA and San Francisco attractions. The Trust is very supportive of this effort, but such a service would not be operated by the Trust.

TN-5. ***Opposition to Main Post Transit Hub***

The SFCTA requests that the Trust explain why a transit center is proposed in the Plan but was rejected as part of Doyle Drive planning.

Response TN-5 – The Trust has consistently sought good transit connections, and although it has proposed a transit hub in the area of the Main Post, it still supports another in the Doyle Drive corridor. A transit center in the Doyle Drive corridor would provide convenient connections between GGT, Muni and the Presidio Shuttle, and the Trust has been part of a Doyle Drive subcommittee (as part of the SFCTA study) that has examined potential locations for such a transit center along a reconstructed Doyle Drive. While supportive of the overall concept, the Trust does not support construction of a large facility in the Doyle Drive corridor that would use valuable park land to provide for timed transfers and layovers for all the GGT and Muni buses that travel along Doyle Drive.

TN-6. ***Marin County***

The City of Sausalito, Tamalpais Valley Gateway Coalition and the GGNRA Citizens' Advisory Commission suggest that the Plan provide for a coordinated and comprehensive transit system linking San Francisco with visitor destinations in Marin County, and encourage the expansion of and the coordination between the Presidio, San Francisco and Marin transit systems to facilitate easy connections for park visitors and employees. Similarly, the City of Sausalito requests clarification as to how the Plan would affect visitor transit to destinations in Marin County.

Response TN-6 – The Trust's PresidiGo service currently connects with GGT and Muni #76 buses at the Golden Gate Bridge Plaza. These services provide transit connections to the Marin Headlands (Muni) and most Marin County

visitor destinations (GGT). Over the long-term, PresidiGo service will connect with the planned Doyle Drive transit center to provide even more convenient services. The Trust will continue to work with the NPS to determine the best way to link visitor destinations, considering both water and land transportation. It would be well beyond the Trust's mandate and ability, however, to fund and operate a comprehensive transit system connecting to regional visitor destinations.

TN-7. ***Ferry Service***

The Sierra Club states that the Plan should not consider ferry service because of the expense of operating ferry service, and feels that revenue from parking fees would be more wisely spent on reducing the amount of development.

Response TN-7 – The Trust appreciates the issues of expense in consideration of ferry service. The Trust intends to continue to work with the NPS and the San Francisco Bay Area Water Transportation Authority to evaluate the feasibility of ferry access to the Presidio. Water transportation has the advantage of providing transit access that can bypass congestion on the roadways and bridges leading to the Presidio. Although these advantages could benefit Presidio-based employees and residents, it is likely that visitors would gain the greatest benefits from scheduled service to attractions such as Crissy Field and Fort Point or to special events at Crissy Field.

The ferries offer the advantage of service to Area A directly, so the Presidio Trust's major impetus would be to ensure that any potential ferry terminals would be adequately served by the Presidio Trust shuttle. The Trust does not anticipate funding ferry service. The use of parking revenues is discussed in Parking responses.

TN-8. ***Transit Plan and Alternatives***

The Sierra Club suggests that the PTIP EIS include alternatives for transit service. The CCSF Planning Department suggests that the PTIP is primarily a policy and land use plan but should be an integrated land use and transit plan. ("The proposed transit center and replacement of Doyle Drive should be closely integrated with the plan's proposals. It is particularly important in the Letterman area and throughout the Presidio to have a strong TDM program to help reduce traffic impacts on adjacent off-site neighborhoods.")

Response TN-8 – The PTMP is a policy framework that will guide decisionmaking on land use and management issues in Area B of the Presidio, including decisions regarding investments in transit services, and decisions regarding transportation demand management (TDM). A comprehensive TDM program is included in the Final Plan, which also articulates minimum performance standards and long-term goals for reducing automobile use. A transit center is proposed at the Main Post, and support is provided for the concept of another transit center associated with Doyle Drive. In all these ways, the Final Plan is the kind of integrated land use and transit plan requested by the CCSF Planning Department – much like the City's own General Plan. Existing and planned (alternative or supplemental) transit services are described, many of which rely on transit providers other than the Trust. These include extension of Muni service, ferry service, enhanced transit connections, and more. Within this programmatic or policy framework there will be ample opportunity to undertake the detailed operations and feasibility studies required to undertake these and other service enhancements.

TN-9. ***Presidio Trust Subsidy of Public Transit Services***

The Sierra Club states that the EIS incorrectly considered increased demand for transit services as an environmental impact rather than as a mitigation measure for the impacts of development, and contends that financial assistance for transit services should be listed as a mitigation measure.

Response TN-9 – The analysis of alternatives is intended to identify areas in which additional transit service may be needed to accommodate the expected increase in ridership associated with the alternatives. Such an analysis is routinely conducted as part of environmental review to determine potential for overcrowding on transit vehicles and potential increased costs to transit service providers. Mitigation Measure TR-10 calls for supporting increased service frequency as warranted, and Mitigation Measure TR-25 calls for monitoring passenger loads. Both measures could result in support for service enhancements if warranted, including potential financial support.

TN-10. ***Transit Passenger Loads***

The CCSF Planning Department requests that the EIS discuss existing and future transit capacities and Maximum Load Points (MLP), the relative transit demand for each alternative, and each alternative's contribution to ridership in

excess of line capacity at the MLP, if applicable. The CCSF Planning Department questions whether the transit ridership estimates cited in the EIS included the existing transit ridership for Area B. The CCSF Planning Department also questions when the described transit impacts would be expected to occur, and requests that the EIS identify measures that would allow for future Muni ridership to be accommodated and describe how these measures would be accomplished. The CCSF Planning Department questions the mitigation proposed to alleviate the effect of congested intersections on transit operations. The CCSF Planning Department also requests that the EIS include a map of the Presidio shuttle route indicating key transfer points to Muni and GGT, and questions whether the proposed Presidio shuttle route will comply with existing City restrictions on neighborhood streets outside the Presidio's boundary.

Response TN-10 – The Draft EIS described the increase in transit passenger loads associated with each alternative. More details of the transit analysis can be found in the Background Transportation Report. Muni baseline future (2020) ridership was assumed to be 127 percent of the existing ridership on each Muni route. The additional ridership expected to be generated by different land use scenarios as analyzed in the EIS, was then added to the estimate of future baseline ridership to obtain the expected future growth. This growth in ridership is based on data from the SFCTA Travel Demand Model and other Muni planning documents.

The Background Transportation Report provides the professional analysis of the maximum load point in each direction for each Muni line, and shows the number of transit riders the Presidio is expected to contribute to the total passenger load at the MLP and the expected total passenger load at the MLP in 2020 under each alternative. The analysis is conservative in that it assumes all of the transit riders generated by the Presidio would ride through the MLP on each Muni route. If Presidio-based passengers board after, or alight before the MLP, the effect on passenger loads will be less than indicated by the analysis. The resulting future passenger load factors on Muni lines will depend on any increases in capacity already planned for implementation. It should be noted that most Muni Presidio routes are in the reverse commute direction and have greater available capacity than downtown routes.

The Presidio's internal shuttle bus service has recently been adjusted in response to field observations and passenger surveys. The revised routes have improved transfer connections to Muni and GGT routes. The Trust will continue to comply with applicable City restrictions on neighborhood streets outside the Presidio's boundary. Because the precise shuttle routes are expected to be adjusted further in the future, no map has been provided in the EIS; instead, the Final Plan has been revised, in response to comments, to illustrate generalized transit connections and transit hub locations.

TN-11. ***More Detail on Golden Gate Transit Service***

The Golden Gate Bridge Highway and Transportation District (GGBHTD) requests that the EIS summarize GGT service by route, describe the impacts to affected GGT routes and how monitoring would help to mitigate these impacts.

Response TN-11 – Existing GGT service and ridership are described in detail in the Background Transportation Report. Because all GGT routes except Route 50 have the same route and stops in the vicinity of the Presidio, GGT routes were not analyzed on an individual basis. Current individual loads, boardings and alightings by route at stops in the vicinity of the Presidio are unavailable, as indicated by GGT staff and referenced at the beginning of the study.

The overall AM peak hour and PM peak hour existing ridership on each GGT route is also provided in the Background Transportation Report. The alternatives discussed in the EIS are expected to generate between 100 and 156 GGT riders during the AM peak hour and between 95 and 212 GGT riders during the PM peak hour in 2020.

If existing GGT service frequencies remain constant, the additional ridership would add additional standees to Route 4 in the AM peak hour, which currently operates at 105 percent of capacity. Four other GGT routes currently operate with load factors between 90 percent and 100 percent in the AM peak hour. If service frequencies remain constant, additional Presidio-based ridership could potentially result in passenger loads exceeding capacity. No routes have a load factor greater than 86 percent in the PM peak hour. Thus, additional Presidio-based ridership is not expected to result in load factors of 100 percent or higher during the PM peak hour. If ridership on GGT buses is distributed differently than current ridership, the higher load factor levels may not be reached. Therefore, monitoring of Presidio-based GGT ridership will

determine whether transit impacts actually occur. In addition to monitoring, Mitigation Measure TR-25 would require coordination between the Trust and the GGBHTD regarding potential improvements if needed. Coordination may include the political or financial support required to expand services.

TN-12. ***Impacts of Tour and Charter Buses***

Several commentors, including the CCSF Planning Department, state that the EIS should address impacts associated with increased numbers of tour and charter buses coming to the park as the result of proposed programs. The CCSF Planning Department states, "The impacts of additional tour and charter bus traffic are not discussed in the EIS. Existing tour bus restrictions on City streets are not discussed in the transportation section. The existing Gray Line/Coach USA Trolley Hop Route and existing ridership should be described. How many additional tour and charter buses will be attracted to the Presidio under each alternative? How much of this future tour and charter bus traffic will be combined trips to Area A and B? Are there trips associated with the development of the Letterman Complex? It is vital that the full cumulative impacts on traffic of tour and charter buses, vehicles, shuttles, and construction vehicles at build-out of Area A, Area B, Letterman, and other foreseeable future projects in the area be considered. What are the potential impacts to pedestrians, bicyclists, and joggers of cumulative build-out in the Presidio and surrounding area. What mitigation measures are proposed for these impacts?"

Response TN-12 – The existing tour bus and charter bus traffic to and from the Presidio (both Areas A and B) is considered in the existing transportation analysis described in the Background Transportation Report. The Final EIS has been revised to include a description of tour bus use and restrictions. The transportation analysis of future conditions assumes that all additional Presidio residents, employees and visitors will access the park (including the 23-acre Letterman Digital Arts Center) via automobile, transit, or bicycle/walking. Some visitors may arrive by tour or charter bus rather than Muni or GGT, although the Trust expects that the Presidio's new (free) internal shuttle bus service will be an attractive alternative to private tour buses for many visitors. Recent discussions with tour bus operators have indicated an interest in using the Presidio shuttle to provide for internal trips to the Presidio, thereby minimizing both traffic and parking impacts of the tour buses.

To minimize the potential effects of tour buses and charter buses in both Area A and Area B of the Presidio and adjacent neighborhoods, the Trust will work with the NPS and the City to develop a strategy for tour bus management, as discussed in the Final Plan. The coordinated strategy will consider bus size, frequency, noise and vibration, use of alternative-fuel vehicles, routing, permitting, idling and parking, interpretation (i.e., tour bus programs for explaining the park's resources and history), and venues to be served.

TN-13. ***Prohibit Tour Buses from Specific Gates***

Several nearby neighborhood groups suggested that the Trust prohibit tour buses from accessing the PHSH district as well as from use of the Arguello Boulevard, 15th Avenue, and Lincoln Boulevard/25th Avenue gates. Cow Hollow Neighbors in Action states that the EIS should describe measures to ensure that tour buses would not utilize restricted City streets.

Response TN-13 – Tour buses are currently restricted from City streets outside the 25th Avenue, 15th Avenue, Marina Boulevard and Gorgas Avenue gates. The restrictions at the 15th and 25th Avenue gates are interim, pending completion of tour bus management plan. Neither the Trust nor the U.S. Park Police has the legal authority to enforce the City restrictions. However, when providing information to tour bus operators with access information, the Trust informs the tour bus operator of the existing restrictions on these City streets, and suggests access routes consistent with these limitations. The Trust will continue to advise tour bus operators about the City restrictions and identify alternative routes when contacted or otherwise providing information. In addition, the Trust will work with the NPS and the City to develop a comprehensive tour bus management plan as described in the Final Plan. The Trust expects that one of the outcomes of the consolidated tour bus strategy could be restrictions similar to the City's for areas just inside the gates that could be enforced by the U.S. Park Police.

TN-14. ***Status of Tour Bus Management Plan***

Several commentors, including the CCSF Planning Department and the Golden Gate National Parks Association, request that the Plan clarify the status of the tour bus/charter bus management plan. The CCSF Planning Department states "What is the status of the tour bus/charter bus management plan referred to in the Draft PTIP? What are the elements included in the plan

that would keep tour buses off neighborhood streets and control their numbers, timing, and access? This plan will have to conform to existing restrictions on City streets. Because of the unhealthy and potentially dangerous effects of tour buses on residential streets within the City of SF, the tour bus/charter bus management plan must ensure that access to and from the Presidio is via Doyle Drive (HWY 101), Park Presidio (HWY 1), Geary Blvd, and Lombard Street."

Response TN-14 – To ensure the orderly movement of tour buses and minimize their impact both within the park and in adjacent neighborhoods, the Trust will be working with the NPS and the City to develop a comprehensive tour bus management plan. The plan will address bus size, frequency, noise and vibration, use of alternative-fuel vehicles, routing, permitting, idling and parking, interpretation (i.e., tour bus programs for explaining the park's resources and history), and venues to be served. Work to date on the plan has included vehicle counts, tabulation and observations of tour bus characteristics, compilation of relevant restrictions, and noise and vibration analysis of various size buses. No target date has been set for completion of the study; however, work is well under way.

The Trust agrees that restrictions must be coordinated with the City. The Trust will consider the option of working with the City to revise restrictions to ensure that in the end the park goals are achieved while protecting adjacent neighborhoods.

4.24 PEDESTRIAN AND BICYCLE SAFETY (PB)

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PB-1. ***Pedestrian and Bicycle Safety***

The Rails-to-Trails Conservancy requests that the PTMP EIS make the provision of safe bicycle facilities within the Presidio a high priority. The CCSF Planning Department and other commentors request that the Final Plan and/or EIS describe specific bicycle and pedestrian facility safety improvements such as signage.

Response PB-1 – As stated in Chapter Two of the Final Plan, safety of bicycle and pedestrian travel is a priority for the Trust. In response to comments, the Final Plan has been modified to include maps showing proposed bicycle and pedestrian routes. These improvements are being studied in detail in the NPS/Trust Presidio Trails and Bikeways Master Plan, a separate planning process now under way. The members of the study team are scheduled to present their recommendations in the summer of 2002, at which time there will be an opportunity for additional public input regarding the proposed routes and prioritization of improvements. These specifics are beyond the scope of the current planning effort.

PB-2. ***Increase in Bicycle and Pedestrian Trips***

The Bay Conservation and Development Commission requests that the Trust clarify why, under the Draft Plan, there would be a significant increase in bicycle and pedestrian trips over the trips estimated in the GMPA 2000 alternative.

Response PB-2 – This increase is due in part to the amount of final square footage of buildings under the Draft Plan Alternative (5.6 million square feet) as compared to the No Action Alternative (GMPA 2000) (approximately 5 million square feet). If this square footage is fully leased and occupied, there would be more projected person trips to the Presidio. In addition, the Draft Plan has a more comprehensive TDM program that includes implementation of parking fees for visitors, residents and employees. The effect of the TDM program will be to discourage access to the Presidio by automobile and, at the same time, to increase the proportion of Presidio employees and residents using alternative modes of transportation, such as walking and bicycling.

PB-3. ***Specific Suggested Bicycle and Pedestrian Network Improvements***

The Rails-to-Trails Conservancy, the San Francisco Bicycle Coalition and several other commentors request specific improvements to the bicycle network in the Presidio, including the conversion of Crissy Field Avenue between Crissy Field and Lincoln Boulevard to a two-way bike path, the conversion of Washington Street to a non-through street for vehicular traffic, and bike lanes along all major bike routes within the park. One commentor suggests Class II bikeways on all roadways in the park. A form letter suggests the creation of an extensive road and mountain bike trail network with new openings and access points on the Presidio boundaries.

Response PB-3 – Specific plans for bicycle lanes, treatment of Washington Boulevard, and treatment of Crissy Field Avenue will be presented in the Presidio Trails and Bikeways Master Plan, which is currently under development as a cooperative effort of the Trust and NPS. Bicycle use of off-road trails is also being addressed in the Presidio Trails and Bikeways Master Plan. Maps showing preliminary proposals for pedestrian and bicycle routes have been included in the Final Plan. Due to concerns regarding impacts to historic resources, new openings in the historic boundary wall around the Presidio are unlikely to occur, with the possible exception of areas where the

wall had previously been open, such as at Greenwich Street. Potential impacts on traffic circulation and transit access may limit the streets that can be entirely converted to pedestrian and bicycle use, or where Class II bike lanes can be included. These issues will be the subject of ongoing study.

PB-4. ***Bicycle Access to the Golden Gate Bridge***

The Rails-to-Trails Conservancy and other commentors requested that the Trust collaborate with the National Park Service to improve bicycle access to the Golden Gate Bridge.

Response PB-4 – The Presidio Trails and Bikeways Master Plan currently under development is a collaborative effort of the NPS and the Trust. As part of the study leading to the preparation of the Plan, bicycling focus groups identified improved access to the Golden Gate Bridge as the number one priority. The NPS and the Trust are working with the Golden Gate Bridge Highway and Transportation District to create a joint plan for improvements to bridge access. Alternatives for alignment of the Bay Trail through the Presidio are currently being studied by the NPS; the Trust is a cooperating agency on the project. The current schedule calls for presentation of draft trail alignment alternatives to the public in fall 2002 and completion of construction documents in spring 2003.

PB-5. ***Effect of Proposed Plan on Bicyclists' Safety and Comfort***

The Rails-to-Trails Conservancy and the San Francisco Bicycle Coalition request that the Presidio Trust consider the impact of all proposed changes, including major renovation projects on bicyclists' safety and comfort.

Response PB-5 – The Trust understands that the Presidio is a major bicycling resource for the region and always considers bicycling impacts when evaluating potential land use changes, transportation developments and construction projects. One commentor cited the Doyle Drive reconstruction project as a major project impacting bicycling. The Trust concurs, although it is not the lead agency involved in the Doyle Drive project. Also, one of the main goals of the Doyle Drive reconstruction project is to facilitate motor vehicle traffic flow on Doyle Drive so that internal park roads such as Mason Street, Washington Boulevard and Lincoln Boulevard would not be used by motorists trying to avoid congestion on the approaches to the Golden Gate Bridge. Thus, following a long period of construction impacts, the Doyle Drive project may result in improved roadway conditions for bicyclists.

PB-6. ***Lower Speed Limits***

The San Francisco Bicycle Coalition suggests that the Presidio Trust set lower and strictly enforced speed limits on Presidio streets to encourage safer conditions for bicyclists, pedestrians and motorists.

Response PB-6 – Enforcement of speeding in the Presidio is the responsibility of the U.S. Park Police (USPP), and the Trust meets regularly with the officers to discuss increased enforcement of speeding and other moving violations. Most Presidio roadways have a speed limit of 25 mph or less, which is consistent with speed limits established in other recreational and residential areas. The highest speed limit is on Lincoln Boulevard where the speed limit is set at 30 mph.

PB-7. ***Closure of Presidio Roadways to Vehicular Traffic***

The San Francisco Bicycle Coalition and several private citizens suggest that the Presidio Trust permanently close some Presidio roadways to vehicular traffic, such as Crissy Field Avenue and Battery Caulfield Road. Commentors also suggest weekend closures to vehicular traffic for recreational use.

Response PB-7 – The issues related to the potential closure of Presidio roadways to motor vehicle traffic are being addressed in the Presidio Trails and Bikeways Master Plan, and (in the case of Crissy Field Avenue) as part of the joint study being conducted by the NPS and Trust for upgrading of the San Francisco Bay Trail. The evaluation of the potential closure of Crissy Field Avenue to motor vehicles will need to address impacts on transit, shuttles, and of increased motor vehicle traffic on alternate routes such as Lincoln Boulevard and McDowell Street. Any changes to Battery Caulfield Road will be considered as part of more focused planning efforts to be conducted as part of the Public Health Services Hospital analyses. Analysis of these suggestions is beyond the scope of the current, more general, planning effort.

PB-8. ***Hazardous Conditions at Lincoln/Merchant Intersection***

The San Francisco Bicycle Coalition and the Rails-to-Trails Conservancy suggest that the Presidio Trust improve the hazardous intersection at Merchant and Lincoln.

Response PB-8 – The Trust is assessing changes to the roadway alignment and use of traffic control devices to improve safety at this intersection as part of a separate study. As a result, the traffic control devices at this intersection will soon be modified, with STOP signs being installed for all approaches as an initial tactic. Long-term recommendations from the Traffic Safety Study and the Presidio Transportation Planning and Analysis Technical Report: A Supplement to the Final General Management Plan Amendment (July 1994) call for realignment of this intersection. The associated issue of bicycle access to the Golden Gate Bridge from the west so that bicyclists can avoid motor vehicle traffic on Merchant Road is being studied in the Presidio Trails and Bikeways Master Plan, as well as in the San Francisco Bay Trail Trust/NPS joint study, as described further in responses above.

PB-9. ***Bicycle Signage***

The Rails-to-Trails Conservancy and the San Francisco Bicycle Coalition suggest that the Presidio Trust add better directional bike signage throughout the park. The San Francisco Bicycle Coalition specifically suggests signs that read, "Bicycles Allowed Full Use of Lane" and bike stencils on streets without bike lanes.

Response PB-9 – For purposes of consistency and continuity, the Trust has adopted the directional route and signing system for bicycles used in the rest of San Francisco. The suggestion for signs that read "Bicycles Allowed Full Use of Lane" on selected roadways will be considered in the Presidio Trails and Bikeways Master Plan, an ongoing planning effort described in more detail in responses above.

4.25 PARKING (PK)

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PK-1. ***Effects on Area A***

Several commentors, including the NPS, request that the EIS address indirect impacts to parking in Area A and propose an effective mitigation program. The BCDC seeks an assurance that the same parking fees and/or time limits would be enforced in Area A and Area B to avoid additional traffic and parking impacts.

Response PK-1 – The PTMP is a programmatic land-use plan for Area B of the Presidio. Parking management is proposed as a standard feature of the Trust's TDM Program for Area B of the Presidio, and would address, among other things, potential spill-over parking impacts in Area B caused by recreational use of Area A. Overall, the Trust's TDM program goal is to minimize the transportation impacts at the Presidio as a whole. However, the Trust recognizes that its TDM program may increase parking demand in Area A and in the EIS suggests implementation of coordinated parking management strategies as a mitigation measure for those potential impacts. It must be acknowledged that implementation of and the responsibility for this mitigation measure falls within the NPS jurisdiction, just as some mitigation measures associated with the Crissy Field Plan now fall within Trust jurisdiction. While the Trust cannot commit to this measure, which is outside of its area of responsibility, it will encourage the NPS to implement adequate parking strategies and will endeavor to ensure consistency of parking management within Areas A and B through continued cooperation and coordination. Active management of parking in Area A by the NPS could fully mitigate all impacts of parking demand from Area B.

PK-2. ***Coordination of Special Events***

The CCSF Planning Department, SPUR, and a neighborhood organization request a discussion of how special events and other major activities at Fort Mason, the Marina Green and within the Presidio will be coordinated with the Golden Gate National Park Association and the City. The CCSF Planning Department also questions how parking for special events will be coordinated with the City.

Response PK-2 – The Trust Special Events Department Coordinator is an active member of San Francisco's Inter-departmental Staff Committee on Traffic and Transportation (ISCOTT), as are representatives of the NPS. ISCOTT is the San Francisco Municipal Government group that meets monthly to coordinate transportation-related impacts in San Francisco, including those due to large public events. This group coordinates impacts from events at the Presidio that affect San Francisco streets and San Francisco events that affect the Presidio. In addition, the Trust coordinates directly with the NPS and GGNPA through the weekly NPS Special Uses Group (SPUG) meetings. SPUG coordinates events for the NPS and GGNPA. The U.S. Park Police and NPS Park Rangers attend SPUG meetings.

PK-3. ***Spillover Parking***

Several commentors, including the CCSF Planning Department, the Sierra Club and the GGNPA, suggest that the Presidio Trust coordinate with the City and the NPS to successfully implement the proposed parking management program and avoid spillover parking to surrounding residential neighborhoods and Crissy Field. The CCSF Planning Department states that the "aim should above all be to reinforce the effectiveness of the TDM effort in reducing the volume of automobile traffic generated by the Presidio, not generation of revenue from parking fees or fines."

Several commentors also suggest that the PTMP and EIS provide more detailed information about the Presidio's proposed parking management program, including the role of the San Francisco Residential Parking Program (RPP) in avoiding adverse impacts to parking conditions in surrounding neighborhoods and the associated costs of avoiding these neighborhood impacts. The Exploratorium and one other commentor opposed the implementation of fee parking in the Presidio based on the belief that it would result in spillover parking in surrounding neighborhoods and Crissy Field.

Response PK-3 – The City's RPP program, including enforcement of the parking regulations, provides the means for the City to protect neighborhoods surrounding the Presidio from parking demand impacts. This program has been established in all neighborhoods surrounding the Presidio except the area west of 17th Avenue in the Richmond District. The Trust expects very little excess parking demand in this area as there are few active uses planned in the southwest corner of the Presidio. Nonetheless, the Trust will work with the City and the neighbors in this area if they want to expand existing RPP districts to provide protections for uncovered areas.

The Trust views the coordination with the NPS and the City as two somewhat different issues. The coordination with the NPS involves ensuring that parking management is consistent across the entire Presidio. Coordination with the City will be focussed on minimizing off-site impacts of the Presidio's program by ensuring that the City's RPP program is effective in preventing parking impacts to the adjacent neighborhoods.

The primary goal of the parking management program is to shift Presidio-based trips to alternative transportation modes of transportation, so as to reduce the impacts of automobile travel both within and adjacent to the park. Revenue generation is important from a cost-recovery standpoint and as a source of funds for providing transportation alternatives such as the internal shuttle bus service, but is not the driving factor behind parking management – which is, instead, a key component of an overall TDM program. Unlike the City, the Presidio Trust and the U.S. Park Police do not have the legal ability to retain revenue derived from parking fines.

PK-4. ***Park-Wide Parking Plan***

A number of organizations request that the PTMP include a park-wide parking plan and specific policy guidance to inform the planning process. The Sierra Club asks that parking spaces be identified by location to understand choices for parking and to determine impacts.

Response PK-4 – The PTMP provides policy guidance to inform future implementation decisions, much like the City's General Plan, with its Transportation Element, informs the City's implementation decisions over time. Until further site-specific plans or proposals are developed, it would be speculative to identify specific parking locations or parking counts. Instead the Plan contains park-wide policies calling for parking fees to be implemented in order to limit parking demand at the Presidio, commits the Trust to implement additional parking supply reductions over time and requires consideration of average, rather than peak demand, considers opportunities for shared parking, and relocation of parking to small, less noticeable lots where possible.

All parking is local, and the suggestion that parking supply and demand warrant Presidio-wide assessment beyond the policies and analysis contained in the Plan and EIS ignores this fact. As future decisions are made regarding specific building uses and landscape improvements, accurate assessments of project-specific parking demand will be made consistent with policies provided in the Final Plan. As a result, the Trust expects an overall reduction in parking supply, effective (shared) use of parking resources, and accommodation of sufficient demand to allow constructive reuse of buildings and thus, generation of sufficient lease revenue to improve and operate the park. Prior to future site-specific analyses and decisions regarding building uses, a Presidio-wide parking plan is neither necessary or useful. See responses below and responses regarding Transportation Demand

Management for more discussion regarding the Sierra Club's suggestions regarding parking demand and supply.

The assessment of project impacts related to parking (and other transportation issues) was undertaken using standard trip generation rates, traffic assignments, and other reasonable assumptions based on the land use alternatives considered. The analysis is not specific to the precise location of all parking, and impacts are not assessed at every single location in the Presidio. The analysis appropriately focuses on overall supply, demand, the potential for spill-over effects, and the inter-relationship between parking, auto use, and traffic congestion. Site-specific effects will be considered in the future as decisions are made regarding building uses and landscape improvements.

PK-5. ***Parking on Roadway Shoulders***

The Sierra Club suggests that the Planning Principles prohibit parking on shoulders so as not to impede pedestrians and bikers and discourage overflow parking to avoid fees.

Response PK-5 – The Presidio Trust concurs with this suggestion and will continue to work toward elimination of parking on roadway shoulders.

PK-6. ***Assumption of Parking Fees in Parking Demand Estimates***

The Sierra Club suggests that the parking demand estimates presented in the Draft EIS do not reflect the parking fees described as part of the Transportation Demand Management Plan in Appendix D of the Plan. The Sierra Club submits that the parking demand estimates reflected in the Draft EIS should reflect the alternative levels of parking fees.

Response PK-6 – Three alternative parking management strategies are analyzed in the EIS. The Minimum Management Alternative does not include any form of parking management. All existing parking spaces would remain in their current location, unregulated and without fees. The No Action Alternative (GMPA 2000) analyzes parking with the same TDM assumptions as analyzed in the 1994 GMPA. The GMPA envisioned limited utilization of parking management strategies and did not incorporate parking fees as part of the transportation analysis. As such, the No Action Alternative (GMPA 2000) uses parking management to ensure that parking is available for Presidio-based uses by providing a limited supply of parking, but does not incorporate parking fees as a TDM measure. All other alternatives use parking fees as a key component of an overall TDM program to shift trips from automobiles to other modes of transportation.

The Trust used proposed land uses, CCSF trip generation rates, parking turnover rates, and a conservative estimate of TDM program effectiveness (including parking fees) to estimate future parking demand. These are standard and appropriate planning methods, representing the best professional judgement of Trust staff and consultants. They do not require identification of a specific dollar amount that would be charged for parking – only that parking fees would be introduced at a sufficient level to provide a disincentive for auto use. The analysis assumes park-wide TDM services including the internal shuttle, parking regulation and sufficient fees to shift 10 percent of all trips to alternative modes by the analysis year of 2020 or before.

The assumed 10 percent shift conforms to the Trust's minimum transportation standard, and not the long-term TDM goal included in the Final Plan in response to comments. It would be inappropriate to assume that the TDM program and/or parking fees will cause a greater shift for the transportation analysis of the EIS since it would mask potential traffic impacts of the plan.

PK-7. ***Excessive Parking Supply***

The NPS requests the Trust to clarify whether providing excess parking is an adverse or beneficial effect.

Response PK-7 – Provision of "excess" parking is not proposed in any EIS alternative, and thus is not specifically assessed. In general, an overabundance of parking reduces the area devoted to landscaped areas and natural resources, and encourages driving. Conversely, providing insufficient parking can adversely affect park visitation and leasing initiatives, and increases illegal parking.

The objective of the Trust's Plan and the policies it contains is to strike a balance among competing interests. The Trust is committed to regulating and charging for parking in Area B of the Presidio in order to limit parking demand, to providing parking supply based on average parking demand in

each area, rather than peak demand, and to additional parking supply reductions over time as part of site-and area-specific planning in the future.

PK-8. ***Parking Structures***

Some commentors infer that all of the Draft EIS alternatives included either an underground parking garage or a parking structure, and request that the Final EIS address the impacts of such facilities. Some commentors are supportive of an underground parking garage at the Main Post Parade Ground. Other commentors disapprove of underground parking for various reasons, including requirements for above-ground structures for ventilation and garage access and costs. Commentors suggest considering underground or camouflaged parking in strategic locations at a later date when it can better be determined whether or not it is necessary.

Response PK-8 – No underground or above-ground parking structures are proposed in any of the EIS alternatives, with the exception of the 1,500-space underground garage previously analyzed and approved as part of the LDAC project. The impacts of this LDAC garage are assessed in the Letterman Complex EIS.

The PTMP retains the possibility of future studies for parking structures if deemed necessary to advance other benefits such as expansion of open space. The Trust recognizes that parking structures are a costly replacement to existing surface parking. The Trust also recognizes the potential benefits of parking structures as a way to concentrate parking at fewer locations, which may expand open space, and that underground parking could further expand open space and shield parking from view. No parking structures were assumed in any of the financial analysis of the alternatives. Parking revenue under the Final Plan Alternative, Final Plan Variant, and other build alternatives is assumed to support the transportation programs. The Trust acknowledges that underground parking garages, if considered in the future, would have needs for above-ground structures for ventilation. These and other issues would be explored during further analyses associated with any specific physical improvement proposal.

PK-9. ***Parking Demand Calculations***

Several commentors, including the San Francisco County Transportation Authority, request the Trust to clarify how parking demand was determined.

Response PK-9 – Parking demand for the six land-use alternatives consists of both long-term demand (i.e., employee and resident parking) and short-term demand (i.e. visitor parking). Long-term parking for non-housing land uses was estimated by determining the number of employees for each land use and applying the average mode split and vehicle occupancy from the trip generation estimates for both external and internal trips. Each employee vehicle trip was assumed to require one space per day. The parking demand for lodging was estimated as long-term only, with a rate of one space per room, which accounts for both employees and guests. For all alternatives, a long-term rate of 2.5 spaces per dwelling unit was used for all existing housing that would be retained, and a rate of 1.5 spaces per unit was assumed for all newly constructed housing. The lower rate for newly constructed housing reflects the smaller size of proposed new housing units.

Short-term parking was estimated based on the total daily visitor trips and the average turnover rate. A short-term parking turnover rate of six vehicles per space per day was applied to most land uses for all alternatives, with the exception of retail and cultural/educational uses, for which a turnover rate of ten vehicles per space per day was used, as well as conference uses, for which a turnover rate of three vehicles per space per day was used. Detailed parking demand calculations by alternative are provided in the PTMP Background Transportation Report.

With the exception of the Minimum Management Alternative, the parking demand for each alternative was reduced due to parking management strategies to discourage single-occupant auto use. These parking management strategies include parking fees and regulating access to parking supply. See responses below for more discussion of parking demand and supply.

PK-10. ***Consideration of Housing in Parking Demand and Supply***

The CCSF Planning Department and Cow Hollow Neighbors in Action infer that parking demand was only calculated for non-residential uses and request that the Final EIS determine total parking demand and supply for Presidio

housing as well as other land uses in the PTMP alternatives. The CCSF Planning Department also questions the parking plans for the 23-acre LDAC, and whether or not demand for the LDAC was included in the cumulative estimates.

Response PK-10 – The parking demand and supply figures in the Draft Plan and EIS included those associated with existing and proposed housing. However, the demand shown in the Draft EIS represented midday weekday demand for all land uses. Although this is the time when average parking demand for the entire park is greatest, it is not the peak usage time for some land uses such as housing. As such, the demand figures have been presented differently in the Final EIS. The demand figures in the Final EIS show average demand for each planning area during the peak time for that particular area. For areas that are primarily residential, recreational, and cultural/educational, the peak demand time occurs on the weekend.

The 23-acre LDAC's parking demand and supply are included in the cumulative estimates. The estimated parking demand for the 23-acre LDAC in the Draft EIS was assumed to be that of typical Presidio office space. The parking demand estimates and supply now included in the Final EIS have been revised to be consistent with the demand and supply numbers presented in the Letterman Complex Final EIS in order to reflect the specific travel characteristics of the LDAC.

PK-11. ***Support of Further Reduction of Parking Supply***

The San Francisco County Transportation Authority questions why more parking spaces were not converted to other uses such as open space, given that management of parking supply is one of the most effective means of managing vehicular traffic.

Response PK-11 – The parking supply figures presented in the EIS are based upon average parking demand during each planning area's peak demand period. The parking demand figures take into account a conservative trip reduction resulting from TDM programs including parking management. The proposed parking supply represents a reduction from the existing number of parking spaces, while accommodating the demand of the land uses proposed in the PTMP. The Trust is committed to further parking supply reductions as part of future site-specific or area-wide planning, assuming that the Trust's TDM program, which includes transportation improvements, proves to be more effective than conservatively estimated in the transportation analysis.

The Trust concurs that constrained parking supply is an effective means of reducing vehicular traffic when used in conjunction with increased alternatives to the automobile. Charging for parking is another effective way to reduce vehicular traffic. Because an overly constrained parking supply can present adverse impacts on park visitation, leasing and adjacent neighborhoods, the Trust is proposing parking fees as the primary strategy in PTMP, supplemented by reductions in supply.

PK-12. ***Reduction of Parking Supply***

Various commentors request the Trust to adopt strategies that would limit the supply of parking to roughly equal to or less than parking demand to meet both transit and parking goals. The Sierra Club asks that the parking supply be the same as under the GMPA and recommends that the Trust impose parking fees.

Response PK-12 – The proposed parking supply in all alternatives is based upon average parking demand during the peak demand period for each planning area. Parking demand calculations took into account a 10 percent reduction in vehicle trips associated with implementing the Trust's proposed TDM program, including parking fees. The effectiveness of the TDM Program assumed for the purposes of the EIS analysis is conservative. The Trust's TDM goals as set forth in the PTMP are more aggressive and are expected to reduce parking demand further, thereby reducing the parking supply that will be needed in the future. Under the Final Plan, the parking supply would be reduced in the future as specific building uses become known, as landscape plans are developed, and as the TDM program effectively reduces overall parking demand.

In response to comments about the calculation of parking demand, and commentors' suggestions to limit parking supply to be roughly equal to parking demand, the Trust has revised the analysis to better reflect average demand for parking based on the land use alternatives.

The Draft EIS presented the average parking demand for the entire Presidio during the midday weekday time period. Although the midday weekday

period represents the cumulative average parking demand peak at the Presidio, it does not equate to the greatest average parking demand in all areas. Average demand for residential areas such as East Housing is greatest on weekends.

Revised parking demand calculations for each planning area estimated cumulative average parking demand by land use during the midday weekday, evening and weekend time periods. The analysis was then amended to show the average parking demand for each planning area during the time period when demand for parking would be greatest. For example, parking demand in residential areas was calculated when most residents are at home, and demand in employment areas was calculated when most employees are at work, then these numbers were totaled. Also, in the South Hills area, estimated parking demand was increased by 250 to reflect the outdoor recreation uses (hiking and golfing) that were not captured by the original demand calculations, which were based exclusively upon building square footages. In another adjustment, the parking demand calculations in the Final EIS assume a parking demand rate of 1.5 spaces per unit for all newly constructed housing and a rate of 2.5 per unit for all existing housing that will be retained. This adjustment reflects the size of current and planned new housing units. Finally, the parking demand and supply for the 60-acre Letterman Planning District were refined to reflect assumptions used in the Final EIS for the 23-acre LDAC. This constitutes amendment of the Draft EIS analysis, which assumed that the 23-acre site was largely comprised of general office space, and included parking demand calculations for general office space.

Parking supply presented in the Final EIS is 5 percent above the revised parking demand figures for all alternatives except the Minimum Management Alternative. The addition of 5 percent is intended to ensure that Presidio parking demand can be accommodated while not oversupplying the Presidio with unneeded parking. The revised parking supply in the Final EIS accounts for opportunities for shared use of parking spaces within a given planning area.

The 1994 GMPA proposed reducing parking in the Presidio from an estimated 13,032 spaces to 8,386 spaces, a reduction of about 4,646 spaces, or 36 percent. The associated analysis concluded that parking in neighborhoods around the Presidio would be unaffected by this change, and that the supply of parking would continue to "accommodate average daily parking demand under normal conditions, with only minor shortages during peak periods" (GMPA EIS, pages 178-179). The proposed supply of 8,386 spaces falls within the range analyzed in the PTMP Final EIS, and thus its impacts and benefits are also captured by the EIS analysis. The Final Plan Alternative would include more building space than the 1994 GMPA, and would thus generate more parking demand, warranting a supply of about 9,165 spaces. Unlike the GMPA, the Final Plan proposes to use parking fees to regulate demand and would not rely solely constraining parking supply. This difference in approach provides additional rationale for the additional amount of parking (about 780 spaces proposed Presidio-wide.)

PK-13. ***Current Parking Utilization at the Letterman Complex***

Cow Hollow Neighbors in Action request that the Final EIS recalculate current parking utilization at the 23-acre Letterman Complex.

Response PK-13 – Current parking supply and utilization considers the entire 60-acre Letterman Planning District, and not just the 23-acre future site of the LDAC, which is currently closed. The number of occupied parking spaces in the 60-acre Letterman Planning District presented in the EIS is based on data collected prior to the closure of the 23-acre LDAC for construction. Future parking supply also considers the entire 60-acre Letterman Planning District since demand from LDAC employees and visitors is included in demand calculations presented for all EIS alternatives. In addition, the parking demand estimates and supply now included in the Final EIS have been revised to be consistent with the demand and supply numbers presented in the Letterman Complex Final EIS in order to reflect the specific travel characteristics of the LDAC.

PK-14. ***Support of Market-Rate Parking Fees***

The Sierra Club, U.S. Environmental Protection Agency, San Francisco Bay Conservation and Development Commission and various individuals request that the Presidio Trust commit to pricing parking fees to cover the cost of all TDM programs and to discourage the use of cars in favor of transit. The Sierra Club also suggests that the Presidio Trust implement market rate parking fees of $7 per day or $140 per month as for employees and visitors in FY2002. The GGNRA and Point Reyes National Seashore Citizens' Advisory Commission suggest that parking revenue be based on parking fees

at the upper end of free-market rates in order to discourage auto use, and supports implementing the fees as soon as possible.

Response PK-14 – The Trust is committed to implementing parking fees in the Presidio and to using the revenues generated to support transit and other improvements designed to reduce reliance on the private automobile. Residential parking management, including fees for every car beyond the first car per dwelling unit, will be implemented starting in summer 2002. Non-residential parking management, including fees to discourage long-term parking by park employees, will be implemented in phases, starting with the Main Post Planning area. One impediment to rapid implementation of non-residential parking has been concerns expressed by NPS regarding potential spill-over effects on Area A and overall effects on park visitorship. Further analysis and consultation regarding these issues will be undertaken shortly, with the hope that the first phase of non-residential parking management can be implemented by mid-2003.

It would be unrealistic to establish specific parking fees in a policy document like the PTMP, which is expected to guide implementation decisions over a 20 to 30 year period. Instead, parking fees will be reevaluated and adjusted over time to maintain a rate that accomplishes the desired results without compromising the Trust's ability to generate reasonable rents from leased space.

PK-15. ***Impact of Parking Fees on Visitation***

The Exploratorium asserts that parking fees will negatively affect visitation to destinations like Crissy Field, the Marina, and the Exploratorium.

Response PK-15 – The Presidio Trust acknowledges that fee parking may discourage some people from visiting these locations. However, there is a need to balance the desire for unrestricted access with the adverse environmental impacts resulting from unrestricted automobiles. Parking fees encourage people to use nonautomobile-dependent transportation modes, such as transit, biking, walking, or carpooling, to visit desired sites, thereby positively impacting the visitation experience for all, and will be pursued incrementally in non-residential areas, as described above. The focus will be on long-term parkers (employees and long-term visitors), and not short-term visitors.

4.26 TRANSPORTATION DEMAND MANAGEMENT (TDM)

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TDM-1. *Inclusion of TDM Program in Transportation Analysis*

Several commentors, including the CCSF Planning Department, the Sierra Club and the San Francisco County Transportation Authority, request that the PTIP EIS not include the TDM program as a common feature of all alternatives. The Sierra Club contends that the EIS should analyze varying levels of TDM, automobile use, and parking demand across different alternatives and discuss the traffic impacts of at least two or more levels of goals showing the effect of a lower automobile mode share. The Sierra Club also presented tables showing varying TDM goals and the corresponding effect on parking demand to be addressed and critiqued by the Trust.

Response TDM-1 – Three levels of Transportation Demand Management were analyzed in the EIS. The Minimum Management Alternative does not include a TDM program, and does not include any parking fees or internal shuttle bus service, which are expected to be the two most effective TDM measures. The No Action Alternative (GMPA 2000) assumes that TDM programs would be provided by the park tenants as described in the GMPA. The analysis of this alternative included the provision of an internal shuttle bus service, but did not incorporate parking fees. As such, the No Action Alternative (GMPA 2000) TDM program is less comprehensive than those included as part of the remaining alternatives, all of which include the same set of park-wide TDM programs, including parking fees, an internal shuttle bus service, and other program elements designed to shift trips from automobiles to other forms of transportation.

By including three different assumptions regarding the TDM program, the EIS allows an assessment of the results or "impacts" of the program or its absence across the range of alternatives. The traffic impacts and parking demand described for the Minimum Management Alternative illustrate a worst-case scenario, with the maximum square footage and no TDM program. The traffic and parking associated with other alternatives illustrate more reasonable outcomes, with minimal or comprehensive TDM programs and a variety of square footages, resulting in a range of person trips, auto trips and parking demand.

The Trust used assumed land uses, CCSF trip generation rates, parking turnover rates, and a conservative estimate of TDM program effectiveness to calculate parking demand for those alternatives where applicable. These are standard and appropriate planning methods, resulting in a conservative estimate that the commitment to park-wide TDM services including the internal shuttle bus service, parking regulation and fees, and other program components will shift 10 percent of all automobile trips to alternative modes. This conservative assumption in transportation mode shift ensures that the potential traffic-related impacts and necessary mitigation measures are not underestimated and that potentially necessary mitigation measures are developed.

The Trust believes that the TDM program being proposed as part of most alternatives could cause a shift much greater than 10 percent. The Final Plan has been revised to describe minimum standards for auto use equivalent to the 10 percent shift, and to incorporate more aggressive long-term goals for the TDM program as transit services are expanded and as population and

employment increases. This goal is generally more aggressive than some suggested by the Sierra Club in that 65 percent of internal trips would be by modes other than private auto.

The Sierra Club's proposal suggests that to achieve a higher transportation mode shift for external trips and external trips is a simple matter of constraining the parking supply, charging for parking, and achieving a higher number of person per vehicle (i.e., 3.3 or 2.0 persons per vehicle rather than 1.4 persons per vehicle as assumed). Methods for increasing the number of persons per vehicle are not clear other than the suggestion that parking revenues be used to subsidize additional transit services. Also, there is no clear relationship in the Sierra Club comments between the parking regulations suggested and the outcomes presented, although the suggestions regarding regulations are extreme, including one that would provide only one parking space for every 15 employees (the 1964 Planning Code limit for the downtown core of San Francisco is cited as the source). Overall, the Sierra Club comments seem to suggest that parking demand can be easily controlled so that in the end, 7,200 employees, 1,650 dwelling units, and park visitation would together result in a demand for close to 7,500 parking spaces park-wide, or 3,710 less than exist today. Aspects of the Sierra Club's proposals are discussed further in the response below, and a thorough critique is contained in a letter to the file prepared by Wilbur Smith Associates dated May 2002. This letter is available for review in the Presidio Trust library.

TDM-2. ***Analyze Alternative with 50% and 30% Automobile Use by Employees***

The Sierra Club requests that the Final EIS analyze alternatives that include a goal of 50 percent and 30 percent automobile mode share for employees. The Sierra Club suggests achieving these goal through the use of parking fees, and by using the revenue from parking fees to subsidize Muni and regional transit providers.

Response TDM-2 – In response to public comments, the Final Plan has been amended to include an aggressive long-term goal of reducing auto use well below amounts articulated in the Draft Plan. In addition, the Final Plan makes clear that the goals included in the Draft Plan are merely the minimum standards that must be met. The standards/goals are as follows:

	Internal Trips	External Trips
Minimum Standards:	50% by auto	70% by auto
Long-Term Goal:	35% by auto	50% by auto

While the minimum standards are, in the professional judgment of Trust staff and consultants, achievable in the near term, the long-term goals will require substantial investments (by the Trust and others) in transit service, and will only be achievable when population and employment at the Presidio reach historic levels. While no goal is articulated exclusively for worker trips, the Sierra Club's suggestion for more aggressive goals has been incorporated into the Final Plan. Reaching a specific goal of 30 percent auto use appears unrealistic in our professional opinion given the low density of housing and employment proposed, and the distance between the Presidio and other residential neighborhoods and employment centers in the region.

TDM-3. ***Analyze Alternative with One Space per 15 Employees***

The Sierra Club requests that the Final EIS analyze a new alternative that assumes one parking space for every 15 employees to reflect the same conditions as provided in the 1964 Planning Code for office space in downtown San Francisco.

Response TDM-3 – The suggestion that parking supplies at the Presidio be constrained so as to provide one parking space for every 15 employees, similar to a 1964 standard for downtown San Francisco, is unrealistic. The Presidio is not as dense or as accessible as downtown, and one of the few competitive advantages it offers for leasing space is the availability of parking.

As clearly articulated in the Trust's Plan, the overall supply of parking will be reduced over time, and parking will be regulated, with fees assessed to long-term parkers. Nonetheless, the Trust must be careful not to constrain the supply or regulate it to the extent that its core mission – preservation of the park's historic buildings and its other resources for public use – is threatened. In other words, the supply cannot be constrained so much that leasing space becomes impossible, or that competition for parking negatively affects the number of visitors who come to the park or their experience once here.

TDM-4. ***TDM Coordination with Area A***

The Sierra Club suggests that the Draft EIS transportation and parking analysis is based on TDM assumptions that cannot be substantiated without commitment from the NPS to implement TDM strategies in Area A. The GGNRA Citizens' Advisory Commission, Sierra Club and another commentor suggest that the Trust and NPS coordinate their respective TDM programs (including parking management strategies), as TDM policies in Area A will affect Area B and vice versa. The Sierra Club specifically addresses parking management, and submits that the commitment not to provide any parking in Area A for Area B employees is essential to any TDM Plan and that parking limitations and pricing are the management controls to keep driving at sustainable levels in Areas A and B.

Response TDM-4 – The Final Plan articulates trip reduction standards and goals that apply whether Area B employees park in Area A or Area B, as both of these types of trips will be counted as "driving to work." In addition, there is only a small amount of parking in Area A that could be used by workers in Area B. East Beach and West Bluff parking areas encompass a total of 560 total parking spaces that could potentially be used by employees from Area B if efforts to coordinate parking management across jurisdictional boundaries are not successful. The EIS analysis appropriately assumes that TDM measures are effective in resulting in a 10 percent shift from auto use. This assumption is dependent on parking management in Area B, and assumes coordinated management in Area A, but is not dependent on parking management in Area A. As stated above, the parking supply in Area A is limited. It is also distant from most employment areas and thus, spill-over parking could only minimally affect the number of people who choose to drive instead of using other modes of transportation.

The Trust expects that benefits of many of the park-wide TDM services provided by the Trust such as the shuttle, car sharing, transit service coordination, and on-site transit ticket sales, will accrue to tenants in Area A of the Presidio as well as to tenants in Area B.

The Trust regularly meets with the NPS to coordinate these and other transportation strategies, and has also been working with the NPS to address issues of implementing some form of parking management in Area A of the Presidio. Nonetheless, as the PTMP is a land use plan for Area B of the Presidio, it would be inappropriate to assume that programs described in the Plan could be universally applied to the entire Presidio.

TDM-5. ***Support for More Aggressive TDM Goals***

Several commentors, including the NPS and the GGNRA Citizens' Advisory Commission, suggest that the PTIP EIS should be more aggressive in its TDM program trip reduction goals. The GGNRA Citizens' Advisory Commission states "The Trust must establish a national model for environmentally sound methods of moving people not cars." The NPS states "in its present form, the program would attract cars at roughly twice the rate as the rest of San Francisco. The NPS recommends that the elements of the TDM Program be more ambitious."

Response TDM-5 – In general, the Trust agrees with the commentors that the Draft Plan "goals" were intentionally set at a level that the Trust believes can be met or exceeded with the TDM program suggested. These goals were then assumed in calculating the potential impact of future vehicular traffic in the park and surrounding areas. The Final Plan has been revised to define what were previously described as goals as minimum performance standards, and to introduce more aggressive long-term goals for automobile trip reductions as transit service is expanded. As proposed, the Trust's TDM program is a national model for TDM programs with required participation and trip reduction performance standards for all tenants, and park-wide services provided by the Trust to support these efforts. In its current form, the Trust's program has already received recognition from the EPA and the U.S. Department of Transportation for joining the Commuter Choice Leadership Initiative, a voluntary public-private partnership that promotes employee-provided commuter benefits. The national program was developed to improve traffic flow and air quality by encouraging U.S. companies to offer employees alternatives to driving to work alone. By participating in the Initiative, the Trust has earned the designation "Commuter Choice Employer," a mark of excellence for environmentally and employee friendly companies.

The rate at which the Presidio attracts cars is directly associated with its layout, density and location. These factors will forever limit the amount of transit service available without massive subsidies by transit agencies or the Trust. The Trust believes that the most effective way to change automobile-oriented behavior is through parking fees for all users of Presidio parking.

The revenue from parking will be used to provide transportation alternatives to those people who can/will use non-automobile modes. Commentors can be assured that the Trust intends to continue to reevaluate and upgrade the TDM program over time, as described in Appendix D to the Final Plan and Mitigation Measure TR-22.

TDM-6. ***Additional TDM Measures to Reduce Automobile Use***

Several commentors, including the Sierra Club and the CCSF Planning Department, request that the EIS consider additional TDM measures to keep automobile use to an absolute minimum. The NPS suggests 1) focus on the morning weekday peak period and weekend, midday auto traffic reduction because during these periods roadways are already at capacity; 2) develop a transit system that is attractive to potential riders, including connections to Transbay terminal, downtown BART, Golden Gate transit, and the GGB Toll Plaza; 3) maintain direct responsibility for providing good transit rather than passing this responsibility along to tenants.

The CCSF Planning Department states "There are many feasible mitigation measures that have not been considered in the EIS. These include participation in the City's CarShare program, employer participation in the Commuter Check program, free transit passes for employees, and maximizing the number of Presidio employees who live at the Presidio. Will priority be given to Presidio workers for housing? Will the Trust control the parking lots and garages used by Presidio tenants, including the proposed underground garage at the Letterman Complex?"

Other commentors express concern about the level of automobile traffic in and around the Presidio, and urge the Trust to limit the impact of vehicular traffic by such measures as clustering parking and making recreational users walk, bicycle or ride a shuttle to destinations; not opening any more gates to cars; and participating in the City's CarShare Program.

Response TDM-6 – Refer to the Final Plan (Appendix D) or the Environmental Consequences section of the EIS which outline most of the above-mentioned TDM measures as part of many of the Plan alternatives being considered. The Trust is also open to suggestions of additional, cost-effective TDM measures that could be implemented, and is currently exploring a relationship with City CarShare to bring their program to the Presidio using both conventionally fueled and electric vehicles.

Tenant-provided commuter check programs that pay for transit tickets for employees is included as a component of the TDM program required of many tenants, and the Trust has already implemented a commuter check program for Trust employees. Commuter check is a widely used program supporting transit use with pre-tax dollars, and presents an appropriate alternative to offering free transit passes to employees. Other components of the Trust's TDM program include housing preferences for employees and parking regulations. Ultimately, all parking at the Presidio will be subject to regulations and fees established by the Trust. Management of parking may be by outside contractors, and will not include the Letterman Digital Arts Center garage.

Unlike the TDM program outlined in the GMPA, the Trust TDM program only delegates TDM activities to its tenants when they are best handled by the tenants. Activities such as Guaranteed Ride Home, which are best provided as park-wide services, will remain the responsibility of the Trust. No matter who bears the cost, enhancing transit service to, from, and within the Presidio is an expensive endeavor. The Trust already funds the internal shuttle at a cost of almost $750,000 annually. Future service enhancements will depend on the availability of funding from parking and lease revenues, on the contributions of park tenants, and on regional transit providers. For example, an employee shuttle to BART is one of the activities mentioned in the TDM program as being a potential joint effort between tenants and the Trust to supplement Muni service.

While the Trust will be studying the reopening of the 14th Avenue Gate for automobile access (see Response TR-15), the Trust will design new gates at Greenwich Street and Chestnut Street strictly for pedestrian and/or bicycle access.

TDM-7. ***Transportation Analysis With and Without TDM Program***

The San Francisco County Transportation Authority requests that the Trust clarify why implementation of the Presidio-wide parking management program and the TDM program should be considered mitigation if they are assumed to be included in most alternatives throughout the analysis. The

CCSF Planning Department suggests that the EIS should analyze potential traffic impacts with and without the TDM program. The CCSF Planning Department states "The traffic analysis includes the assumptions of TDM program goals for all alternatives except the Minimum Management Alternative. This assumption means that the amount of traffic shown on the roads analyzed is reduced for five alternatives and that traffic has shifted to other travel modes, such as transit. Until the effectiveness of the TDM program has been demonstrated, using this assumption for traffic analysis leads to unsubstantiated and potentially unrealistic results. The trip-reducing impacts of the TDM program should be quantified and documented. Potential transportation impacts should be analyzed without the assumption of an effective TDM program. The TDM Program mitigation measure is both a mitigation measure and assumed to be part of the project description and assumed in the traffic analysis. Since the program consists mainly of strategies and lacks concrete detail for implementation, the Draft EIS should analyze potential impacts with and without such mitigation."

Response TDM-7 – As noted by the Sierra Club, the 1994 GMPA introduces its transportation strategy with the statement that "the Presidio will become a model of environmental protection and a showcase for sustainable design" (GMPA, page 42). The PTMP embraces similar goals in the discussion of transportation issues in Chapter Two. In light of these statements, it is appropriate to consider a TDM program as part of the project being analyzed.

In its EIS analysis, the Trust used a very conservative 10 percent shift in automobile trips as a result of the commitment to implement an extensive TDM program including parking fees, internal shuttle services, and other activities required to meet the minimum transportation performance standards. Based on past results and experiences in other cases, the 10 percent shift in vehicle trips to other modes is a reasonable assumption. U.S. studies have demonstrated that paid parking alone can reduce drive-alone commuting between 17 percent and 44 percent (average 25 percent) and the number of cars driven to work by between 14 percent and 28 percent (average 19 percent).[1] The PTMP analysis methodology is consistent with the GMPA transportation analysis, which shifted vehicle trips to transit due to the proposed TDM program, and is also consistent with the analysis of similar projects undertaken by the City, such as the Hunters Point Shipyard Redevelopment Plan.

To clarify what is included in the project being analyzed, and what is proposed as mitigation, the Final Plan and EIS have been revised to include as minimum performance standards what were previously described as goals, and to introduce a more aggressive long-term goal for automobile trip reductions as transit service is expanded. Mitigation Measure 19, TDM Program has also been revised to clarify that the Trust will monitor effectiveness of the program proposed as part of the project, and implement additional TDM activities or intensify existing TDM strategies if vehicle trips exceed expectations.

TDM-8. ***Effect of TDM Program on Park Visitation***

The Exploratorium suggests that the Trust not develop TDM and parking management programs that would discourage park visitation, and claims that out-of-town visitors would not elect to use public transportation. The Exploratorium specifically states "There is a basic contradiction between the stated goals of the Trust regarding visitor traffic to this National Park and the TDM and Parking Management Programs."

Response TDM-8 – TDM and parking management programs are not intended to discourage park visitation, but to encourage appropriate transportation modes to access the Presidio. Parking fees demonstrate that providing parking has a cost and that this cost should be borne by those who drive and park at the Presidio. It is inappropriate to hide this fee in the price of admission charged to all users despite the way in which they access the site. Many out-

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[1] "Cashing Out Employer-Paid Parking: An Opportunity to Reduce Minimum Parking Requirements," Donald Shoup, 1995. "A Guidance Manual for Implementing Effective Employer-Based Travel Demand Management Programs," Comsis Corporation and the Institute of Transportation Engineers, 1993.

of-town visitors recognize the difficulties of driving in San Francisco and therefore use public transit to access the Presidio and similar destinations.

TDM-9. ***Adjust TDM Program***

The Neighborhood Association for Presidio Planning and the GGNRA Citizens' Advisory Commission urge the Trust to adjust the TDM program to limit the number of internal trips, increase vehicle occupancy and decrease parking needs.

Response TDM-9 – The Trust TDM standards for internal trips sets a maximum of 50 percent automobile trips and assumes 1.4 persons per vehicle. This translates into 35.7 vehicle trips for every 100 internal person trips by automobile. Housing preferences, internal shuttle bus service, improved bicycle/pedestrian network, and implementation of parking fees are expected to produce these results or better. While the Trust feels that it is unreasonable to expect a higher vehicle occupancy for internal trips, the minimum standard can be met in a variety of ways as long as the number of vehicles per 100 person trips is not exceeded. For example, lower automobile occupancy would be allowed by an increase in the usage of non-automobile modes such as transit, biking and walking. It is unclear how the commentors would achieve desired results different than these or impose restrictions or vehicle occupancy.

TDM-10. ***Limiting Automobile Use for Tenants***

The Neighborhood Association for Presidio Planning, the GGNRA Citizens' Advisory Commission, and another commentor urge the Trust to require adherence to strict restrictions in vehicular use as a condition of occupancy in the Presidio.

Response TDM-10 – TDM program participation and agreement to attain or improve upon the minimum transportation performance standard is a requirement of all non-residential leases. The Trust must balance the TDM requirements imposed on tenants with the need to generate revenue from leasing buildings and recognizes that for most tenants, trip reduction is not part of their core business. As a result, the Trust will continue to take a proactive role by providing park-wide services such as the internal shuttle that encourage non-automobile use, and will monitor tenants' TDM program results. Parking management, including parking fees, will moderate tenants' parking demand.

TDM-11. ***TDM Program Effectiveness***

One commentor submits that the Trust should not rely upon the TDM program to mitigate traffic impacts without having substantiated the effectiveness of the TDM program. Several commentors, including the CCSF Planning Department, the Sierra Club and the Golden Gate Bridge Highway and Transportation District, request that the Trust substantiate the effectiveness of the TDM program and describe how it will be enforced and monitored. The CCSF Planning Department specifically states "The Trust as landlord has the ability to ensure tenant compliance with the goals of both the TDM and Parking Management programs. The program lack incentives to ensure their success, and lacks incentives to shift people from single occupancy vehicles to transit. How will the programs be managed to quantify their success and make adjustments if goals are not reached? What will the financial contribution of the Trust to enhance MUNI service and other improvements outside the Presidio boundaries? The approach needs to be multi-modal, and to establish performance standards to evaluate its effectiveness over time, particularly as major employers come on line…How will enforcement of TDM Program measures be monitored?"

Response TDM-11 – As stated in Mitigation Measure TR-22 and Appendix D of the Final Plan, effectiveness of the TDM program will be monitored through periodic surveys. Minimum performance standards are enforceable through tenant leases. The effectiveness of TDM programs that include charging for parking have been substantiated in many previous transportation case studies. In addition, the Trust is in the unique position of requiring tenant participation in TDM programs and attainment of trip reduction standards. The Trust will conduct periodic employee transportation surveys as part of their monitoring of park-wide TDM services. These surveys will measure individual tenants' success in meeting the TDM program trip reduction goals. The Trust also has the ability to conduct parking lot counts should the survey prove ineffective in measuring tenants' automobile mode split. Tenants that are not meeting TDM goals will be required through their leases to implement additional TDM measures until the goals are met. The Trust's TDM

Coordinator (an existing position) is charged with implementing the Trust's TDM program, including park-wide TDM services and monitoring.

The Trust already makes a financial contribution to Muni to operate additional downtown express commute service to and from the park. The Trust will continue to work with Muni to ensure appropriate levels of transit service to the Presidio. The Trust also operates a free shuttle bus service within the park that connects to Muni. This service enhances existing local and regional transit service and serves as both an extension and feeder service to Muni and Golden Gate Transit. These services will continue, and will be supplemented as resources become available.

TDM-12. ***Comprehensive Regional TDM Program***

The CCSF Planning Department and one individual suggest that the Trust link its TDM program to the City's and region's efforts to develop an effective, regional, multi-modal transportation system. The CCSF Planning Department suggests "TDM requires continual coordination with the City and County of SF, including transportation planners from the Planning Department as well as MUNI and the Department of Parking and Traffic. Currently, transportation facilities are at or exceeding capacity. The only way to increase capacity is to use higher capacity modes of transport. It is important that the Presidio transportation program be integrally linked to the City's and region's efforts to develop an effective, regional, multi-modal transportation system."

Response TDM-12 – The Trust agrees that its programs would benefit from coordination with the City and regional transportation agencies. The Trust requires all tenants to register with Rides for Bay Area Commuters, the regional TDM services broker. The Trust also works closely with Muni, the Golden Gate Bridge Highway and Transportation District, San Francisco Department of Parking and Traffic, San Francisco Department of Public Works, San Francisco County Transportation Authority, San Francisco Clean Cities Coalition, City CarShare and others who coordinate transportation services and the region's efforts to develop an effective, regional, multi-modal transportation system.

Although roadway capacity is a constraint in some cases, many of the trips on transportation facilities serving the Presidio occur in the reverse commute direction, leaving sufficient capacity for Presidio-based trips. This condition does not modify the Trust's commitment to TDM as a strategy for reducing reliance on private automobiles.

TDM-13. ***Inclusion of Letterman Digital Arts Center in TDM Program***

The CCSF Planning Department asks that the Trust clarify whether the TDM program includes the Letterman Digital Arts Center project.

Response TDM-13 – The preparation and approval of the Letterman Complex Final EIS was the first occasion for the Trust to detail the park-wide TDM program. The LDAC project has a separate Final EIS that details the TDM requirements for that particular development. These requirements mirror the program presented in the Final Plan, including the required trip reduction standard. However, the LDAC parking lot will not be under the Trust's control for implementing parking management programs.

4.27 DOYLE DRIVE (DD)

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DD-1. *Coordination of Doyle Drive Construction with the PTMP*

Caltrans, the CCSF Planning Department and others request that the Final EIS describe how phased construction of Doyle Drive would be coordinated with project phasing at the Presidio.

Response DD-1 – Phased construction of Doyle Drive is still being analyzed by the Doyle Drive study team. All plan alternatives being evaluated by the Trust assume complete reconstruction of Doyle Drive in less than five years, which is shorter than the 20-year PTMP time horizon. Detailed phasing of the Plan implementation is difficult to assess. Completion of Doyle Drive is evaluated, however, as part of the cumulative impact analysis of the Plan alternatives.

The Trust is closely coordinating its proposed projects in the Doyle Drive corridor area (e.g., Tennessee Hollow, possible Crissy Marsh expansion, Crissy Field Area B development) with the Doyle Drive reconstruction study team. Since all of the current Doyle Drive alternatives are confined to roughly the same horizontal alignment, no significantly different issues are expected in terms of overall land use planning in the Presidio.

DD-2. *Traffic Impacts without Doyle Drive Project*

Several commentors, including Caltrans, the CCSF, and the SFCTA, request that the Final EIS address the traffic impacts without the Doyle Drive project. The SFCTA states that Doyle Drive reconstruction should not be included in the No Action Alternative (GMPA 2000).

Response DD-2 – The reconstruction of Doyle Drive is a highway project sponsored by the SFCTA, Caltrans and the FHWA; its purpose and need relate to traffic and seismic safety. Although the Doyle Drive project would affect travel patterns to and from Area B of the Presidio because it proposes new access at Girard Road, the majority of the project would retain current roadway capacities and it is essentially independent of "build" – "no-build" land use decisions for Area B. No funding has been identified for construction of the Doyle Drive project, but substantial resources have been allocated towards its planning and design, and it is contained within the State's 25-year transportation improvement plan. For these reasons, assumption of reconstruction in the No Action and other EIS alternatives is reasonable.

Traffic impacts without Doyle Drive reconstruction were tabulated for the largest of the Plan alternatives, Alternative D (Cultural Destination[1]). This alternative was selected because it had the highest peak hour traffic generation of all the alternatives. The results of this sensitivity analysis have been included in the main body (Volume I) of the PTMP Background Transportation Report, and demonstrate that during both the AM peak hour and PM peak hour, the following intersections would require mitigation if Doyle Drive is not reconstructed as planned:

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[1] For traffic purposes, Doyle Drive reconstruction is herein defined as those Doyle Drive alternatives that provide a direct new connection to the Presidio. All current Doyle Drive reconstruction alternatives except for No-Build and "Retrofit and Widen" provide a new interchange to an extension of Girard Road.

	AM	PM
• #2 - Lyon/Lombard		X
• #3 – Richardson/Francisco	X	X
• #4 – Gorgas/Lyon/Francisco	X	X
• #28 – Lincoln/Kobbe	X	
• #31 – Lincoln/Merchant	X	
• #33 – Lincoln/GG Bridge Viewing Area		X

Mitigation would include an additional turn lane at Lincoln/Merchant, Lincoln/Kobbe and Lyon/Lombard, a traffic signal at Lincoln/Golden Gate Bridge Viewing Area, and removing stop signs from the major approaches at Gorgas/Lyon/Francisco. The intersection of Richardson/Francisco would not be able to be reasonably mitigated. These mitigations are not proposed by the Trust at this time because Doyle Drive reconstruction is planned and analyzed as a cumulative project (i.e., part of the future setting).

In terms of transit, bus routes serving the Presidio would be minimally affected if Doyle Drive is not reconstructed because of construction of the Richardson slip ramp project (Mitigation Measure TR-1) proposed in the Final Letterman Complex EIS. Transfers with Golden Gate Transit service would occur at current stops at the Golden Gate Bridge Plaza and at Richardson/Francisco. The Presidio shuttle bus service would provide regular connections with both of these stops. In addition, Muni buses would provide service to the proposed Main Post transit center through current gates. Tour buses would continue to access the park through the gates they are currently permitted to enter plus the new Richardson Avenue entrance and exit. Pedestrian and bicycle access would continue via the current paths.

Additional analysis of project impacts if Doyle Drive is not reconstructed with a direct Presidio access will be included in the Doyle Drive Environmental and Design Study Draft EIR/EIS, which is expected to be published in fall 2002 by the SFCTA. The Doyle Drive project is using as input land use forecasts prepared by the Trust and consistent with the Final Plan Alternative.

DD-3. ***Consideration of Doyle Drive Alternatives***

Several commentors including the CCSF Planning Department and the Golden Gate Bridge Highway and Transportation District (GGBHTD) suggest that the PTMP EIS consider different alignments for Doyle Drive, its placement of a primary entrance point to the Presidio, and its effects on development patterns in the Presidio.

Response DD-3 – The Trust is a cooperating agency in the Doyle Drive Environmental and Design Study EIR/EIS and, in this capacity, has had considerable input in all issues relating to the project, particularly alignment alternatives and location of access points. In the matter of alignment, the primary concerns relate to conservation of the Presidio's natural and cultural resources. This has dictated an alignment coincident with the current highway alignment, and a variety of vertical alignments have been and will continue to be studied as part of the Doyle Drive project. Though important to the park, these options are more properly studied as part of the highway project, and are largely independent of the issues assessed in this programmatic EIS.

The location of primary vehicular points of access to the Presidio is important and relevant to the land use and circulation alternatives presented in PTMP EIS. A variety of potential access locations were examined as part of the consideration of the Doyle Drive project, and all but the location at Girard Road were rejected. The Girard Road location was found to have the least impact on park resources and was located between the park's major vehicle generating planning districts – Letterman and the Main Post. The effect of this new point of entry on development and circulation in the park was considered throughout the PTMP planning process.

One commentor suggested that direct access to Doyle Drive might obviate the need to reopen the 14th Avenue gate. Since that gate is primarily intended to serve local traffic in the vicinity of the Public Health Service Hospital, vehicle usage at that location would not be greatly affected by what happens vis-à-vis Doyle Drive.

DD-4. ***Effects of Doyle Drive on Crissy Marsh and Tennessee Hollow***

Several commentors including the City and County of San Francisco Planning Department, the Sierra Club and the Urban Watershed Project suggest that the

Trust require the Doyle Drive alignment and ramps to allow for Crissy Marsh expansion and Tennessee Hollow drainage to the marsh.

Response DD-4 – The Trust and GGNRA have worked closely together to advocate for these important natural resource projects with the Doyle Drive study team. Most of this effort to date has focussed on Tennessee Hollow because the general location of the Tennessee Hollow riparian corridor is known, and it crosses all Doyle Drive alignments.

The Trust, in its scoping comments to the SFCTA on the Doyle Drive reconstruction project (April 3, 2000) states that "Doyle Drive alternatives must be coordinated with the Tennessee Hollow riparian corridor restoration project." To this end, the SFCTA has considered the Tennessee Hollow corridor as a given, and worked with the Trust and NPS in analyzing the impacts of various vertical alignments on the riparian corridor as well as potential methods for ensuring its viability.

Less effort to date has been spent on Crissy Marsh expansion because potential locations for expansion to the north have yet to be identified and because the horizontal alignments of the Doyle Drive reconstruction alternatives do not vary substantially. While the presence of Doyle Drive may constrain the range of possible marsh expansion alternatives, the Trust will continue to work with the Doyle Drive team in evaluating the impacts (if any) of the vertical highway alignment alternatives on marsh expansion as they develop.

DD-5. ***Provision of Parking under New Doyle Drive***

The Neighborhood Associations for Presidio Planning and other commentors suggest that the Presidio Trust consider replacing parking spaces under the new Doyle Drive.

Response DD-5 – The Trust intends to provide sufficient parking to support proposed land uses in the most environmentally acceptable and cost-effective manner. At Crissy Field the Trust expects that many of the parking spaces currently under Doyle Drive would be eliminated and may consider replacing some of that parking under a new elevated Doyle Drive structure if that configuration of the replacement roadway is selected. Once a preferred alternative for Doyle Drive is selected, the feasibility of providing associated parking will be examined in concert with advancement of the Doyle Drive designs.

DD-6. ***Consideration of Loss of Parking Currently under Doyle Drive***

The SFCTA requests that the Trust clarify whether or not the loss of parking spaces currently under Doyle Drive has been incorporated into the future parking supply analysis.

Response DD-6 – The parking supply presented in the Final EIS assumes an overall net reduction in parking supply from what currently exists in Area B. Although much of the parking supply will likely be located where parking spaces currently exist, more specific future planning will refine the specific locations and layout of parking spaces. If the future design of Doyle Drive would not provide space beneath the structure for parking, there would still be adequate space to provide the proposed parking supply in other areas of Crissy Field.

DD-7. ***Describe Connections to Doyle Drive***

The CCSF Planning Department requests that the Trust describe connections to Doyle Drive from the proposed major employment centers.

Response DD-7 – The Final EIS includes a description of the connection to Doyle Drive via a new interchange at Girard Road. This access point is consistent with alternatives being considered as part of the Doyle Drive planning process, and would connect to major employment centers via local streets such as an extension of Girard Road to Lincoln Boulevard, and Gorgas Avenue.

4.28 WATER SUPPLY AND UTILITIES (UT)

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UT-1. *Water Supply and Demand*

The CCSF notes that the EIS did not identify either average daily or peak daily domestic and irrigation water demand. Several commentors question the amount of water that is purchased from the City, why such purchases are needed, whether they should continue, and how these purchases are consistent with the notion of sustainability. Others inquire about future water supplies and alternative sources, including use of groundwater and how water supplies would be met if groundwater resources are reduced or lost. The SFPUC states that the Presidio, as a "retail" customer, would be subject to water shortage and mandatory rationing. The NRDC questions how or why the Trust had determined that water recycling is the solution to meeting water demand before conducting NEPA review for that project.

Response UT-1 – Sections 3.6.1 and 4.6.1 of the Final EIS were expanded to more clearly address current and future water demand and supplies. In response to comments, Section 4.6.1 was revised to include peak and average daily irrigation demand. The Draft EIS presented only a peak irrigation demand factor of 1.0 million gallons per day for all alternatives. This factor was a carryover from the 1994 GMPA, and was originally used by the Army. In order to assess peak and average demands, the Trust used the Presidio Water Balance (PWB), a predictive computer model that was updated after the Draft EIS was prepared. The PWB model incorporates a variety of data, including consideration of evapotranspiration rates, that help to more accurately predict peak and average irrigation demands. The projected demand for domestic water was also revised based on the updated PWB model. Information on peak domestic water demand was not incorporated into the Final EIS, however, because this type of water use remains relatively constant throughout the year; in other words, it does not experience the same type of seasonal fluctuation as irrigation demand.

With regard to water supply at the park, the following overview is provided and an expanded discussion of this subject was incorporated into Section 3.6.1 of the Final EIS. Most of the Presidio's water needs are met with on-site resources (i.e., Lobos Creek). Water is diverted from the creek, treated at an on-site treatment facility, and conveyed through the local water distribution system. Lobos Creek flows vary from year to year, based on annual precipitation and other climatic conditions. For many decades, Lobos Creek supplies have been supplemented by water purchases from the SFPUC. The Army, the NPS, and now the Presidio Trust purchase water from the SFPUC on an as-needed basis – primarily during the warmer months when water demand is higher and on-site supplies are lower. Most of the SFPUC water comes from Yosemite National Park (Hetch Hetchy Reservoir), with supplemental supplies from the local San Francisco watershed. Similar to Presidio supplies, the availability of local SFPUC water resources varies significantly based on the type of water year and have historically provided from six to 18 percent of the total water. Last year the Trust purchased approximately 15 percent of the total water consumed at the park, and the remaining 85 percent was provided by Lobos Creek.

The SFPUC estimates that current demands from its system are approximately 90 million gallons per day (mgd), and has identified the Presidio as a "retail customer" in the *San Francisco 2000 Final Urban Water Management Plan* (SFPUC, February 2001). The SFPUC's plan shows an estimated daily demand for the Presidio of 1mgd through the year 2020. None of the PTIP alternatives evaluated in the EIS would require this level of constant supply.

The Trust is committed to reducing the demand for off-site water resources as discussed further below. As a retail customer, the purchase and use of water from the SFPUC is subject to its water shortage regulations, including mandatory water rationing programs and rate structures adopted during drought conditions. The Final EIS (Mitigation Measure UT-2: Water Shortage Emergency Response) was modified to specifically acknowledge these requirements.

Historically, the Army operated groundwater wells to supplement supplies from Lobos Creek and those purchased from the City. Several wells near the existing water treatment plant, Mountain Lake, and Presidio Golf Course were used. These wells were taken out of service before the Trust assumed jurisdiction over Area B, and the Trust is not proposing to use groundwater as part of its water supply system in the future. For more information on groundwater, refer to Response WR-2. Under any alternative, the Trust's approach to water supply management is a combination of aggressive conservation (domestic and irrigation) and water recycling.

The Trust has made substantial progress with domestic water conservation through installation of efficient fixtures (faucets, toilets, etc.) as a standard part of building rehabilitation, through education, and through other best management practices. Several notable irrigation conservation projects have also been implemented, including the installation of a computerized, satellite-based irrigation system at the Presidio Golf Course that has substantially reduced water consumption at the course. Water savings are demonstrated by the fact that while reuse of buildings at the park has increased over the past three years, water demand has remained relatively constant. The Final EIS articulates additional measures that will be implemented by the Trust to further these efforts.

In addition, the Trust has taken a proactive approach to providing an alternative source of water at the park – recycled water. Use of recycled water at the Presidio was not determined to be the solution to water supply management through the PTMP planning process. Use of recycled water has been a long-time vision for the park and was originally identified by the NPS in the GMPA. The GMPA Final EIS determined that up to 1.0 mgd of recycled water would be used at the park. At the time the GMPA EIS was prepared, it was assumed that this water would be provided by the City. In 1996, the City prepared a Recycled Water Master Plan and, although a Final Environmental Impact Report was certified for the project, the plan was never adopted. The City is currently revising the plan to provide a smaller, less costly project. In 1999, during the review of the Letterman Complex Draft EIS, the City specifically asked the Trust to consider developing an on-site water recycling project, and the Trust is presently completing the necessary NEPA review for this project. Implementation of the proposed water recycling project would not only help meet water needs, but would also substantially reduce the amount of wastewater flows sent to the City's combined sewer system.

UT-2. ***Fire/Emergency Water Supply***

Two individuals comment on the existing fire/emergency water supplies within the Presidio and in adjacent San Francisco. Specific recommendations include providing an on-site standby emergency water supply for fire fighting, use of Mountain Lake and surrounding groundwater wells, and tying the Presidio and CCSF systems for mutual protection.

Response UT-2 – Consistent with the Uniform Fire Code, the Presidio Trust at all times maintains a minimum three-million-gallon water storage reserve for emergency fire flows at the park. This amount was established by the NPS Fire Department, and is maintained in the park's primary reservoir (i.e., the six-million-gallon storage reservoir located near the Presidio Golf Course). To provide enhanced protection, the Trust routinely maintains an additional two million-gallons of storage in the same reservoir – reserve of five-million gallons.

The Presidio's fire flows are distributed through the potable water system and thus only potable water may be used. The majority of the CCSF system similarly relies on its potable water infrastructure for fire fighting. Mountain Lake does not meet potable water standards and therefore could not be connected directly to either the Presidio or CCSF potable water supply systems. In order to provide this connection, a water treatment plant would have to be constructed to treat Mountain Lake water to meet California Department of Health Service standards. In the event of a major disaster,

however, Mountain Lake water could be used by tanker trucks to haul water to a fire.

The three wells surrounding Mountain Lake were constructed by the Army and were historically used for irrigation. The wells have been out of service for many years and there is no storage or distribution pipeline associated with these wells. Pursuant to the Trust's permit to operate the Lobos Creek Water Treatment Plant, the wells will be permanently closed in the coming year.

The Presidio is currently connected to the CCSF potable water system at six locations. These connection points, however, provide only unidirectional flow (from the CCSF to the Presidio), and convey water that is purchased from the CCSF on an as-needed basis. Back flow preventers have been installed at each of these connections, and the CCSF system operates under a higher pressure level than the Presidio system. The Presidio Trust and CCSF (SFPUC) have met to discuss opportunities to increase the connectivity and expand on-site water storage to improve mutual protection in the event of an emergency. The Trust hopes to continue these discussions with the SFPUC to identify the associated physical/system modifications, regulatory requirements, and other actions that would be needed to achieve this goal.

UT-3. ***Water Conservation***

Several commentors encourage the Trust to make a commitment to a program of water conservation and best management practices, including specific recommendations that are listed and individually addressed below.

Response UT-3 – The Trust is committed to both water conservation and a water recycling program. The mitigation measures presented in Sections 4.6.1 and 4.6.2 of the Draft EIS provide a range of conservation measures that would be implemented by the Trust. The mitigation measures in these sections have been updated in the Final EIS in response to public comments. The Trust continues to pursue opportunities to make recycled water available for use at the Presidio. In March 2002, the Presidio Water Recycling Project EA was released for public review and comment. The EA evaluates alternatives for providing up to 500,000 gallons per day of recycled water for non-potable uses at the park.

Several commentors make specific recommendations for water conservation actions or other related best management practices, many of which have already been implemented or are identified in the EIS as mitigation. A discussion and response to each recommendation is provided below.

- *Separate storm and sewer systems, wherever possible:* The Presidio has two separate sewer systems – one for storm water and the other for sanitary sewage (i.e., wastewater). Refer to Sections 3.6.2 and 3.6.3 of the Final EIS for more information on the Presidio's two sewer systems.

- *Maximize on-site treatment of Presidio's sewage and storm water:* Through the proposed Presidio Water Recycling Project described above, the Trust would maximize on-site treatment of sewage. With regard to stormwater treatment, there are a variety of physical structures (i.e., oil water separators) and operational activities (i.e., street cleaning) that are currently implemented to improve the quality of stormwater. For additional discussion of current and future stormwater and wastewater management actions, including Mitigation Measures UT-4, UT-6, and UT-7, which address this subject, refer to Sections 4.6.2 and 4.6.3 of the Final EIS and Response WR-4.

- *Minimize or eliminate the Presidio's contribution to the City's combined sewer system:* Implementation of the proposed Presidio Water Recycling Project would substantially reduce wastewater flows to the City's combined sewer system. Water conservation and on going repair and maintenance of the park's infrastructure would further minimize these flows. Refer to Mitigation Measure UT-4 in the Final EIS (Section 4.6.2) and Response UT-8 for more information on this subject.

- *Maximize treatment and use of on-site recycled water/minimize or eliminate use of potable water for landscaping, toilet flushing, fire fighting, and other non-potable uses:* This objective would be realized through implementation of Mitigation Measure and the proposed Presidio Water Recycling Project. The latter would maximize the on-site capture and reuse of wastewater flows. While there are many uses for recycled water, the primary focus of the proposed Presidio Water Recycling Project would be landscape irrigation, which comprises approximately half of the Presidio's water budget and thus provides the greatest

opportunity for water savings. Although toilet flushing is a possible application for recycled water, many of the structures at the Presidio are historic and implementation of dual plumbing systems would require major renovation that could disturb historic fabric and/or substantially increase costs. As an alternative, the Trust has identified aggressive water conservation practices, including the requirement that all buildings are rehabilitated using high-efficiency fixtures (toilets, faucets, etc.) to maximize the reduction in potable water consumed for toilet flushing. The Presidio's fire fighting infrastructure is connected to the potable water system and use of recycled water for this purpose would not be feasible. Also see Response UT-2. Because the proposed Presidio Water Recycling Project maximizes current and future available supplies and fully uses this water on-site, the need to seek out additional uses for recycled water is not great. If circumstances change in the future to warrant expanded use of recycled water, the Trust would consider such applications. Refer to Mitigation Measures UT-1 and UT-3 in Section 4.6.1 of the Final EIS for more information on this subject.

- *Commit to BMPs for water conservation:* Mitigation Measure UT-1 (see Section 4.6.1 of the Final EIS) demonstrates the Trust's commitment to implementing BMPs for water conservation. The BMPs were updated based on public review and input, and address both domestic and irrigation efficiency.

- *Reduce the need for water distribution infrastructure by limiting landscape watering needs and shift land uses and replace built areas with native vegetation:* Under most of the alternatives evaluated in the EIS, including the Final Plan, there would be an overall reduction and conversion of built space to natural areas. This shift would include the conversion of built or landscaped areas to native plant communities consistent with the adopted Vegetation Management Plan (VMP), thus reducing the need for water distribution infrastructure. Some new landscaped areas may be created, but these would generally be affiliated with cultural landscape restoration or recreation goals. Mitigation Measure UT-1 identifies requirements for any new or expanded landscaped areas that would ensure that water-efficient systems and drought-tolerant plant materials are used, consistent with the adopted VMP.

- *Minimize use of lawns except as needed for playing fields:* The adopted VMP establishes specific guidelines for the three vegetation zones at the Presidio: historic forest, native plant communities, and landscape vegetation. The VMP was developed with extensive public input and provides a comprehensive and coordinated management framework for the Trust and NPS to use in managing vegetation at the Presidio. The overarching goal of the VMP is to protect the natural, cultural, recreational, and scenic resources of the park. Removal of all lawn areas, except for playing fields, at the Presidio would not be feasible as many turf areas are considered part of the cultural landscape. However, the VMP does call for the expansion of native plant communities, and use of drought-tolerant and non-invasive plants within the approved landscape vegetation zone.

- *Minimize overhead irrigation and limit irrigation to non-daylight hours:* The discussion of irrigation guidelines, as presented under Mitigation Measure UT-1, has been expanded in the Final EIS in response to this comment. It now includes specific reference to requirements for efficient irrigation systems. Limiting irrigation to non-daylight hours would be required for the use of recycled water. In response to this comment, Mitigation Measure UT-1 was also revised to include evaluation of non-daylight irrigation for expanded application throughout the Presidio.

- *Require the installation of purple piping in new construction and major renovations:* Mitigation Measure UT-1 identifies this as a best management practice. Refer to recommendation above regarding use of recycled water for toilet flushing.

- *Make installation of separate water meters for residential and commercial tenants should be made a high priority:* Installation of meters is identified in Mitigation Measure UT-1 in the Final EIS. (The Trust has already initiated meter installation, which should be completed for all occupied buildings in the near future. All vacant buildings will be metered as part of any rehabilitation effort.)

UT-4. ***Support for Recycled Water***

Several commentors, including the CCSF, Sierra Club, Alliance for a Clean Waterfront, and California Native Plant Society indicate their support for creating recycled water supply at the Presidio and reducing the amount of potable water consumed for non-potable uses.

Response UT-4 – The Trust appreciates the support and considers the use of recycled water, in combination with aggressive water conservation, a critical element in the practice of sustainable management of the Presidio resources. The Trust has initiated planning and environmental review for a proposed on-site water recycling project that would help substantially reduce the amount of potable water consumed for non-potable uses (i.e., landscape irrigation), while minimizing wastewater flows to the City's combined sewer system.

UT-5. ***Effects of Recycled Water Project***

The NRDC and CCSF raise questions related to the possible impacts of an on-site water recycling project, and how and when these impacts will be addressed. The California Native Plant Society expresses concern related to the possible discharge of recycled water directly into natural sources of surface water.

Response UT-5 – The project-specific impacts of the proposed Presidio Water Recycling Project, including effects on groundwater resources and adjacent natural areas and land uses, are evaluated in a separate NEPA document that was released for public review and comment in March 2002. A copy of the Presidio Water Recycling Project EA is available on the Trust's website (www.presidiotrust.gov) or will be provided upon request. As described in the EA, the application of recycled water would be governed by stringent permit restrictions that include requirements to avoid over-watering, adherence to strict quality criteria, and other actions that would minimize potential effects to adjacent natural areas.

The Trust is not proposing to discharge recycled water directly into any natural source of surface water. The concept of using recycled water at Crissy Field or Tennessee Hollow was initially considered as a way to increase water available for restoration projects as well as to reduce the amount of wet weather flows entering in the City's combined sewer system during peak wet weather events (when the City's Southeast Water Pollution Control Plant (SEWPCP) can experience combined sewer overflows, or CSOs). It was determined that the effectiveness of this option in minimizing CSOs would be very small because the Presidio's contribution (both current and projected) represents less than one half of one percent of the capacity of the SEWPCP. With the availability of other measures to effectively achieve the same end (i.e., reduce wet weather flows to the CCSF system), and the opposition expressed by the NPS during scoping for the recycled water project, this concept was removed.

UT-6. ***Capacity of Proposed Recycled Water Plant***

The CCSF and NRDC ask why the proposed water recycling project described in the Draft EIS provides for only 200,000 gpd when demand is higher, and also raise questions related to amount of irrigation and landscape vegetation at the park.

Response UT-6 – Information related to the total landscaped areas under each of the alternatives, as well as the peak and average daily irrigation demands are provided in Table 1 and Section 4.6.1, respectively, of the Final EIS.

The first phase of the proposed Presidio Water Recycling Project would have a daily treatment capacity of 200,000 gallons per day (gpd), with a buildout capacity of approximately 500,000 gpd. The capacity of the proposed Presidio Water Recycling Project was based on two primary factors: 1) the location and quantity of available raw wastewater, and 2) limitations on the use of recycled water at various locations within the park. A summary of these factors is provided below, and additional information is provided in the Presidio Water Recycling Project EA (March 2002).

There are five locations along the Presidio's boundary where wastewater is discharged to the CCSF's combined sewer system. Of these, one conveys about 85 percent of all flows. The Presidio Water Recycling Project proposes to tap into this discharge location to ensure maximal capture and reuse of the flows.

Early in the planning process, potential recycled water use areas/demands were evaluated. Initially it appeared that there was excess demand for recycled water (i.e., wastewater flows generated at the park could not fully meet the demand for recycled water), and a larger project potentially treating wastewater from both the CCSF and Presidio sources was considered. Since that time, however, various constraints on the use of recycled water in certain areas of the park were identified. The affected areas include the Presidio Golf Course, various residential areas, and several ballfields. The constraints vary by site, but can generally be categorized by either their location within the Lobos Creek watershed and/or their location in an area designated for natural habitat restoration.

Lobos Creek is the primary potable drinking water source for the Presidio, and the Trust's Domestic Water Supply Permit specifically prohibits the use of recycled water within the Lobos Creek watershed. The Presidio Golf Course is located within the Lobos Creek watershed and therefore use of recycled water is not being proposed in this area. Several residential areas and ballfields in the East Housing planning district are located within the Tennessee Hollow restoration study area. It is anticipated that the need for irrigation water and associated infrastructure in this area could be substantially reduced or possibly eliminated depending upon the outcome of the restoration planning that was initiated late last year. Because future demand for irrigation in this area is unknown, and current demand is relatively small, this area was removed from consideration as a potential recycled water use area. Following removal of the Presidio Golf Course and Tennessee Hollow restoration area uses, the park-wide projected demand for recycled water was reduced so that the proposed 500,000 gpd project would successfully meet the bulk of on-site demand.

UT-7. ***EIS Analysis of Wastewater Treatment and Disposal***

Three commentors, including the NRDC, request that Section 4.6.2 of the EIS be expanded to include more analysis, and/or have specific recommendations for additional information that should be included in the Final EIS. The CCSF identifies an error in the description of the CCSF's combined sewer overflows in Section 3.6.2 of the Draft EIS. The CCSF also indicates that it has not agreed to rerouting wastewater from the Presidio to the CCSF's Westside system and that the EIS should describe how this would occur.

Response UT-7 – As requested, Section 4.6.2 was revised to incorporate additional information and analysis of wastewater impacts. At the recommendation of the CCSF, the wastewater generation factor in the Final EIS was also modified; it was increased from 80 percent to 90 percent. The incorrect statement regarding the capacity of the CCSF's sewers leading to its Southeast plant as the primary cause for CSOs was removed from Section 3.6.2 of the Final EIS.

Mitigation Measure UT-6 in the Draft EIS stated that the Trust would "...consider re-routing wastewater from the eastern side of the Presidio to the western side..." during peak storm events. This concept was included in the Draft EIS in response to a request made by the CCSF in 1999. During the public review and comment period for the Letterman Complex Draft EIS, the CCSF specifically requested that the Trust consider three options for reducing the cumulative effects of increased wastewater and water demand at the park (CCSF letter dated August 2, 1999). The options identified by the CCSF were: a) consider development of an on-site water recycling plant, b) consider on-site storage of wastewater/recycled water during wet weather flows, and c) consider opportunities to re-route wastewater flows from the CCSF's Southeast Water Pollution Control Plant (SEWPCP) to the Oceanside Plant. In response to these requests, the Trust acknowledged these issues in the Draft EIS and has further evaluated these concepts as part of the Presidio Water Recycling Project EA (March 2002).

The Trust apologizes for any confusion, and in response to the CCSF's most recent comments, and the mitigation measure has been revised in the Final EIS to acknowledge that any future consideration of re-routing wastewater flows to the westside of the park would require further consultation and approval by the CCSF.

UT-8. ***SEWPCP and Environmental Justice***

The Alliance for a Clean Waterfront expresses concerns related to the operation of the CCSF's Southeast Water Pollution Control Plant (SEWPCP) and corresponding issues of environmental justice for the nearby Bayview and

Hunters Point neighborhoods. The Alliance states that the Presidio should not be increasing the burden on the community and should eliminate wastewater discharges to the CCSF's system.

Response UT-8 – The Presidio Trust concurs with the Alliance, and is committed to minimizing wastewater flows to the CCSF's system, and in particular flows to the SEWPCP. A summary of the actions taken to date, and planned future actions, to achieve this goal are provided below.

Before leaving the Presidio, the Army implemented a large-scale infrastructure repair program. Based on these repairs, as well as later repairs made by the Trust (i.e., slip-lining existing pipelines to minimize stormwater infiltration), there has been a substantial reduction in the amount of Presidio wastewater entering the CCSF's combined sewer system. Although it is difficult to make a direct comparison between the annual flow data from before and after these various improvements were made (as occupancy rates have also varied), there is clearly a noticeable reduction. For example, metering data indicates that total 1990 Presidio wastewater flows entering the City's system were about 475 million gallons. In 2000, total annual flows were reduced to approximately 120 million gallons or roughly one-quarter of the 1990 flows.

The Trust is currently proposing an on-site water recycling project that would capture and reuse the majority of the Presidio's wastewater flows that are treated at the SEWPCP. In March 2002, the Trust released for public review and comment the Presidio Water Recycling Project EA evaluating this proposal. Following completion of the NEPA review process, the Trust's goal is to implement the first phase of the proposed water recycling project and have the plant operating by the end of 2003. Once operational, the plant would divert the bulk of the flows away from the SEWPCP and provide for on-site treatment and reuse. In addition, the implementation of stringent water conservation practices, including requirements for water efficient fixtures (toilets, faucets, etc) in all building rehabilitation projects, will also minimize wastewater generation at the park.

In total, the above actions will substantially reduce the Presidio's contribution of wastewater flows to the CCSF's system. Current and projected future (2020) flows would represent less than one half of one percent of the dry and wet weather capacities of both the SEWPCP and Oceanside Plant. Although this contribution is very small, the Trust is committed to implementing the above actions to further reduce these flows to the greatest extent practicable and assist in alleviating any burden placed on the Bayview and Hunters Point neighborhoods.

UT-9. ***Miscellaneous Wastewater Questions***

The CCSF asks several detailed questions related to the Presidio's sewer system, as set forth below.

Response UT-9 – A discussion and response to each question is provided below.

- *Have toxic contaminants been found in the Presidio's sewer system? If yes, are there plans to remove these sediments?* The Presidio Trust operates and maintains two separate sewer systems, one system for storm water and the other for sanitary sewage. As part of regular maintenance activities, sewer lines (both storm and sanitary), manholes, inlets, and other structures are regularly cleaned. Liquids and sediments removed from the sewers are separated in accordance with standard practice, and are disposed in accordance with applicable regulations. Solid wastes are analyzed to determine proper disposal. To date, sediments recovered from Presidio storm sewers have qualified for disposal as non-hazardous, regulated waste at a Class II landfill.

- *Is there evidence of system-wide infiltration of stormwater into the sanitary sewer system and if yes, has it been quantified? Is there a comprehensive plan to rehabilitate the sanitary collection system, and what is the budget for this work?* In response to the CCSF's questions, additional discussion of infiltration was incorporated into Section 3.6.3 of the Final EIS. Responses to the CCSF's specific questions are provided below. Before leaving the Presidio, the Army implemented a major infrastructure repair program that included slip-lining of main and lateral sanitary sewer lines with high density polyethylene (HDPE) pipe, which reduces the potential for infiltration of stormwater into the sanitary system. These activities helped to substantially reduce infiltration as well as separate the storm and sanitary sewers. During 2000 and 2001, the

Presidio Trust conducted surveys of the Presidio sanitary sewer system. Several remaining areas requiring immediate repair were identified during the surveys, and these repairs have already been implemented. The Trust also installed a flow gauge on the sanitary sewer discharge line in order to monitor the flows discharged to the CCSF sewer system. Based on the sewer outflow reports, it appears that there may still be some minor points of infiltration within the system. The Trust plans to address these minor areas as part of comprehensive sewer upgrade plan. The Trust will initially conduct a modeling effort of the current system. The results of this modeling will then be used to inform the development of the sewer upgrade plan, which would be prepared sometime after the NEPA review process is completed and a Final Plan is approved. A budget for these capital improvements is not available, because the plan has not yet been prepared.

- *Is there a maximum wastewater flow limit in the agreement between the CCSF and the Trust?* There is no flow limitation stated in the CCSF/Trust agreement for wastewater services.

UT-10. ***Stormwater Runoff***

The CCSF and the NRDC have several comments related to the Draft EIS analysis of stormwater. In particular, the CCSF questions the use of the .85-inch-per-hour rainfall intensity factor in runoff calculations and indicates that the runoff calculation in Table 53 appears to be underestimated. The CCSF states that it believes runoff from the Presidio would reach the CCSF sewer system in about 15 minutes. The NRDC criticizes nature of the discussion of water quality in the Draft EIS, indicating that it is "superficial."

Response UT-10 – The primary source of available information related to Presidio storm hydrology and system capacity is the 1994 Presidio Storm Water Management Plan (Storm Water Plan) and corresponding model. The Stormwater Plan was used in the preparation of stormwater analysis provided in the Draft EIS. In the Storm Water Plan, the 30-minute and 60-minute storm events were evaluated because they "...correspond to the time of concentration of the individual subbasins as well as the cumulative time of concentration for the watershed basin" (Section 5.1, Storm Water Plan).

The suggested rationale for the 15-minute intensity rate used by the CCSF in the EIS is that this would be the "expected timeline for stormwater to reach the City's system." The Presidio has a separate storm and sanitary sewer system and stormwater runoff from the park is conveyed to San Francisco Bay, the Pacific Ocean, or Crissy Marsh. There are small areas along the southwestern boundary of the park where stormwater is conveyed to the CCSF's system. No increases in the runoff from these areas are anticipated under any of the EIS alternatives, and in fact there would be a reduction in stormwater flows conveyed to the CCSF's system as the Trust proposes to remove Wherry Housing. In addition, while the 1.96-inch per-hour 15-minute intensity rate may be appropriate for use in the design of CCSF infrastructure, the Presidio has notably different physical condition. The intent of the EIS analysis is not to inform design, but rather to provide the reader with a comparison of the relative changes in runoff that may occur under the various alternatives. Therefore the average rainfall intensity of 0.85 inches per hour (representing mean flow as generated from a 60 minute – ten year event) was used to estimate runoff from each alternative, along with the gross runoff coefficient for each planning district. It should be noted that the runoff coefficients from the Storm Water Plan represent 1994 conditions, and as such do not account for various beneficial changes (i.e., removal of impermeable surfaces) that would occur over time, for example with the proposed removal of Wherry Housing and conversion of the Main Post parking lot into a landscaped area.

The hydraulic model prepared as part of the Storm Water Plan incorporates detailed information on topography, soil type, coverage of permeable surfaces, and other site-specific information on a subbasin level for the entire park. The Trust believes that this tool is the appropriate source to use for future system designs. The Presidio Trust will be updating the storm system hydraulic model to reflect as-built conditions stemming from the Crissy Field project and various other storm water improvements. This model will be used in conjunction with the selected PTMP alternative to guide required storm sewer improvements, and implementation of BMPs to allow for greater infiltration and less runoff (detention basins, unlined channels, etc.).

As requested, an expanded discussion of stormwater quality has been incorporated into Sections 3.6.3 and 4.6.3 (Storm Drainage) of the Final EIS.

This discussion addresses the Trust's current efforts to finalize an interim Stormwater Pollution Prevention Plan (SWPPP). The SWPPP is being prepared in coordination with the NPS and will include the sampling design and protocol, threshold requirements for constituents monitored, and a reporting mechanism for program. The SWPPP will also include park-wide BMPs, consistent with the California Stormwater Best Management Practices Handbook, including physical structures such as oil-water separators and infiltration basins, as well as operational practices such as street sweeping that will be implemented to minimize runoff and improve water quality. There are four oil-water separators located on stormwater lines that drain to Crissy Marsh. The Trust also conducts year-round street sweeping and regular maintenance and cleaning of stormwater inlets. The Presidio Golf Course has implemented as site-specific SWPPP which includes a variety of BMPs such as practices to minimize irrigation and runoff, regular cleaning of inlets, cleaning of golf carts, and other practices. The interim Presidio-wide SWPPP is being developed specifically to adhere to the general guidelines for storm water management as established under the National Pollutant Discharge Elimination System (NPDES), and will remain in effect until the Trust obtains an NPDES Phase II permit.

4.29 SCHOOLS (SC)

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SC-1. *Relationship with San Francisco School District*

SC-1. *Relationship with San Francisco Unified School District*

Three commentors state that the Presidio does not pay any property taxes to local or state authorities and asserts that Presidio tenants attending San Francisco schools would not contribute to the traditional revenue sources used to fund the school system.

Response SC-1 – The commentors are correct in noting that because the Presidio is under exclusive federal jurisdiction, no property tax flows to the school district. However, as noted in the EIS, in order to offset the loss of revenue due to federal property being exempt from local property tax, the federal government established the School Impact Aid program, administered by the U.S. Department of Education. Under this program, school districts are compensated for non-military students living on federal property when a parent works on federal property. In fiscal year 2000, SFUSD received approximately $67,000 from the Impact Aid Program for all federal facilities in San Francisco. SFUSD estimated compensation is approximately $235 per pupil residing at the Presidio.

4.30 OPERATIONS/FINANCIAL COMMENTS (FI)

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FINANCIAL MODEL ASSUMPTIONS

Assumptions Concerning Revenues

FI-1. ***The Financial Model as an Indicator of Self-Sufficiency***

One commentor, in the business of residential real estate management, notes that the Trust's financial model should reflect the assumption that residential rent levels could decrease in the future, making the goal of reaching self-sufficiency more difficult. The commentor notes that it cannot be assumed (as many commentors do) that "the Trust will be able to readily exceed the financial point of self-sufficiency in the year 2013. Assuming easy access to capital and the kinds of markets that existed a scant year ago this might be true." But, the commentor points out, with the current downturn in the market, current residential rent levels have not fallen as low as they will fall and "the residential component with which we are involved will be affected along with virtually all the other … market rate properties in the Bay Area."

Response FI-1 – The Trust acknowledges, as this commentor points out, that the goal of achieving financial self-sufficiency and ensuring the Presidio's long-term financial sustainability is both difficult to attain and far more complex than the PTMP financial planning model reflects. It is important to understand, at the outset, that the financial model developed by the Trust's economic consultant, Sedway Group, and used to evaluate the PTMP planning alternatives was designed for a single purpose – to compare general land use alternatives. It compares each alternative's financial implications by using reasonable assumptions based on the best available information, keeping as many assumptions as possible constant across all alternatives in order to make the comparison among alternatives meaningful. The model provides an estimate of the revenue-generating potential of the different PTMP land use scenarios and thus is able to predict the amount of time required to complete the capital program under all alternatives. The model is not designed to predict long-term Trust operating costs, actual revenues, what the market will do in terms of rents, future budgets, building-specific implementation decisions, planned future phasing of projects, or other future financial decisions of the Trust. For full discussion of the PTMP financial model, refer to Volume III of the Final EIS, Appendix K (Financial Analysis).

Because it was designed as a planning tool and not a budgeting or forecasting tool, the PTMP financial model does not answer all questions about the Presidio's financial future. Moreover, it does not depict inevitable business cycles (i.e., the financial model neither indicates economic booms or economic downturns in the future). Instead, the financial model is based on conservative revenue assumptions, intended to reflect neither the high nor low of business cycles. It is important to interpret the financial results in this light and understand what the financial model does not say about future cash flows and future implementation decisions. Specifically, the financial model was not designed to:

- *Forecast Actual Expected Cash Flows:* The financial results generated by the model should not be interpreted as forecasted cash flows for the Presidio. Too little of actual future financial conditions can be accurately predicted over the model's 30-year modeling horizon, and therefore one cannot rely on the PTMP model to forecast cash flows. In all likelihood, the actual financial performance of the final land use mix at the Presidio will be different from the modeled financial performance of the various PTMP land use alternatives. The Trust will rely on other tools and refined assumptions to forecast expected cash flows and make implementation decisions.

- *Reflect Actual Implementation Decisions:* The financial results generated by the model are based on a set of assumptions about how the Presidio's future land uses might be implemented. These are assumptions only, and do not represent a schedule or plan for implementation. These assumptions will almost certainly change over time in response to new information and changing market conditions. Thus, the PTMP financial

model assumptions (e.g., the number of residential conversions, the level of third-party rehabilitation funding, the amount of space improved, and even the costs and revenues) should be viewed as modeling assumptions only and not as actual policy decisions of the Trust.

Actual residential rents at the Presidio may either decline or increase over the 30-year planning period. Future increases or decreases in rental rates are not reflected in the financial model. Instead, the financial model starts with current (i.e., actual) residential rents at the Presidio and carries them forward 30 years, without any adjustment, even for inflation. The financial model does not reflect business cycles due to the difficulty of forecasting the inevitable but unpredictable ups and downs of the market over a long (30-year) modeling horizon. Furthermore, the purpose of the model – to compare PTMP planning alternatives – is not dependent on the precise revenue assumptions, but on keeping those assumptions constant across the alternatives. Inflation adjustments and other changing assumptions would only complicate the model and obscure the comparison of alternatives.

FI-2. ***Conservative and "Below Market" Office Rents***

Commentors criticize the financial model's office rent assumptions as being too low, therefore unnecessarily lowering revenue estimates. They point to one of the conclusions in a recent General Accounting Office (GAO) Report to Congress (dated October 2001) on progress being made by the Trust toward its mandates: "The General Accounting Office's latest report on the Trust suggests that the 'market rate' rents assumed in the PTIP financial analysis may actually be quite a bit below current market rates in San Francisco[,]" and therefore "tended to minimize projected revenues."

Response FI-2 – The office rent assumptions developed for purposes of the PTMP financial planning model are reasonable and do not understate revenues in the model. When the Trust began the PTMP planning process in early 2000 and initiated the development of a financial planning model to compare the relative performance of different plan alternatives, the San Francisco Bay Area was still in the midst of a dramatic economic growth period. The office rental market in San Francisco was super-charged, as high-technology firms leased any available space at a frenetic pace. At the end of the second quarter 2000, when the GAO was conducting its research, the average annual asking rate for Class B office space was about $65 per square foot (full service)[1] in the City's north financial district and about $60 per square foot (full service) in the City's south financial district.[2] These rents were the highest on record, and double what they had been just two years earlier.

Because business cycles are inevitable, it was unreasonable for planning or financial modeling purposes to assume these super-high rents would continue indefinitely in the future. Rather than relying on unsustainably high market rents for office space as the 30-year office rent assumption in the PTMP financial model, a "market rent," based on historical office market trends, was used as the assumption for the long-term revenue-generating potential of Class B and Class C office buildings at the Presidio. The Trust's real estate consultants looked at a seven-year trend (1994-2000) for Class B and Class C buildings in areas outside the central business district of San Francisco. These data showed an average annual asking rate of about $29 per square foot (full service) for Class B space and about $23 per square foot (full service) for Class C space. Using these figures as guides, the financial model assumed an

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[1] Full service (FS) rents include operating expenses, such as utilities, landscaping, and maintenance costs.

[2] Source: BT Commercial Real Estate, San Francisco Office Report, Second Quarter 2000.

average annual asking rate of about $30 per square foot (NNN)[3] for Class B space and about $20 per square foot (NNN) for Class C space.[4]

The performance of the San Francisco office market since the second quarter of 2000 demonstrates that the modeling decision to base office rent assumptions on trended data was appropriate. As of the end of the first quarter 2002, for buildings outside the Central Business District (i.e., non-CBD) of San Francisco, the average annual asking rate was about $31.00 per square foot (full service) for Class B space and about $23.50 per square foot (full service) for Class C space. These rates, which are substantially similar to the modeled office rent rates, represent a return to 1997 levels.[5] In reality, the rates may be higher or lower over time but, based on the trended seven-year rate, the PTMP office rental rate assumptions are rational and reasonable.

FI-3. ***Update of the Financial Planning Model's Assumptions***

The Sierra Club urges the Trust to update the inputs to the financial model to the latest and best information and assumptions regarding rental rates. "The Sierra Club urges the Trust to review its estimates of rental rates used in the long term forecast and include the update in the Final EIS financial model...."

Response FI-3 – In response to this comment, the Trust undertook the review urged by the commentor, and a number of financial model assumptions, including rental rate assumptions, were revised for purposes of presenting an updated financial analysis of PTMP alternatives in the Final EIS. Some of the modeling updates include factual information that has become known or final since the distribution of the Draft EIS. Factual updates included in the baseline financial analysis reflect Fiscal Year 2001 budget figures (expenses and projected revenues), Fiscal Year 2002 budget estimates, terms of the agreement with Letterman Digital Arts, Ltd. (revenues and expenses), actual building lease revenues for 2001, and expected building lease revenues for 2002 and beyond. In response to comments seeking a lower level of park programs, financial modeling assumptions regarding program expenses were also modified. In addition, the financial model was extended from 20 years to 30 years to incorporate the financial implications associated with removal of Wherry Housing over that time frame. Other modeling updates, including rental rate assumptions, are presented in the form of various sensitivity analyses in Volume III of the Final EIS, Appendix K (Financial Analysis). These updates are explained further in the Financial Analysis Technical Memorandum (Final EIS, Appendix K).

With regard to the update of non-residential rent assumptions, the Trust examined whether the 7-year trended average rent rates used in the Draft EIS financial analysis were reliable given the unusually high rates associated with the 1999/2000 economic boom. At the end of 2001, the San Francisco office market was still in the midst of a severe market correction after the surging economy of 1999 and 2000. As a result, the Trust (through its economics consultant, Sedway Group) conducted additional research on current non-residential building rents at the end of 2001, and concluded that continuing to use trended 7-year rates for PTMP financial modeling was reasonable. See Response FI-2. Nevertheless, because these high rates were historically unprecedented, in response to these comments, the Trust performed a sensitivity analysis using an eight-year average rather than the baseline seven-year average. The eight-year average included rates from the more recent market downturn, thereby dampening any upward bias in the rental rate

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[3] "Triple-net" (NNN) means rent that does not include charges for operating expenses, which are billed separately. Thus, total tenant occupancy costs include triple-net rent and operating expenses.

[4] Because the Trust also charges office tenants a Service District Charge (SDC) of about $3.60 per square foot per year, the modeling assumption for Class B space is a rental rate of about $33.60 per square foot per year (Full Service) and $23.60 per square foot per year (Full Service) for Class C office space. These figures are slightly higher than the trended, full-service market rents for Class B and Class C buildings outside the central business district of San Francisco. The model assumes a slightly higher full-service rent to account for the superior architectural quality and setting of Presidio office buildings, compared to most Class B and Class C office buildings located outside of San Francisco's financial district.

[5] Source: Cushman & Wakefield.

assumptions. The eight-year average reduced annual Class B office rents (NNN) from $30 to $25 per square foot and annual industrial rents (NNN) from $12 to $7.50 per square foot. Also, to better reflect long-term market fluctuations, the vacancy rate for all classes of office space was increased from five percent to ten percent. These changed assumptions are a reasonable representation of long-term office market conditions and are reflected in a sensitivity analysis contained in the Final EIS, Appendix K (Financial Analysis).

Interestingly, the effect of these changes in the Class B office and industrial rental rates and vacancy rate assumptions on the financial outcome of the alternatives was almost inconsequential, in part because the financial effect is spread over such a long period. When the financial analyses were run for the Final EIS using these revised rates, alternatives that have a more diversified mix of uses, and a large amount of residential space (which, in the San Francisco Bay Area, tends to maintain its pricing better than commercial space during an economic downturn) were less affected by reduced office rents. Reducing industrial rents had little impact because industrial space is not one of the primary revenue-generators in any of the planning alternatives (i.e., industrial revenues in the model are small both on a per-unit basis and as a percent of total revenues). Nevertheless, reducing these rents did result in an extension of the time required to complete the capital program and to fully fund reserves for all alternatives. This extension ranged from three to ten years, depending largely on the dependence of the alternative on Class B office space to generate revenues.

This financial sensitivity analysis and others presented in the Final EIS confirm that any actual deviations from modeling assumptions can affect the financial outcome and thus the temporal performance of the alternatives, sometimes only modestly but possibly significantly. Because there is a high degree of uncertainty inherent in any financial forecast (particularly one as long as 30 years), the financial results should be viewed as reasonable estimates based on reasonable assumptions, and not as predictions of future conditions. The financial analysis presented gives an indication of each alternative's capacity to achieve self-sufficiency, but, as the Trust has repeatedly noted, the model is most useful as a comparative planning tool, not as a financial forecasting or budgeting tool.

FI-4. ***Rent Assumptions for Space Leased to Non-Profit Tenants***

Two commentors ask the Trust to reconsider the model's assumption about rental rates for space leased to non-profit tenants. "The Trust should determine what rates have been paid by nonprofits for Class B or other space in San Francisco over the past several years, rather than use Fort Mason as the soul [sic] term of reference for comparables."

Response FI-4 – For all alternatives, the financial model assumes that non-profit office space would be leased on average at $9 per square foot, triple net (NNN), in annual rent. Sedway Group's assumption of $9 per square foot (NNN) was developed based on what tenants currently pay in average triple-net rents at Fort Mason Center (i.e., the primary market comparable), located close to the Presidio. The reasons for using Fort Mason Center as the basis for the model's rent assumption for non-profit space and cultural/educational space at the Presidio are the following:

- *Unique Location Near the Presidio:* The location of Fort Mason Center is most similar to the Presidio's unique location. Fort Mason Center is located at the intersection of Buchanan Street and Marina Boulevard, approximately one mile from the Presidio. The vast majority of San Francisco's non-profit organizations and cultural/educational tenants are located in low-rent areas of San Francisco closer to central downtown, such as Civic Center, Mid-Market/Tenderloin, South of Market and the Mission District. These areas offer critical and convenient access to public transportation and funding sources, such as corporate donors and governmental agencies – benefits that the Presidio does not offer. Therefore, Presidio non-profit space is more comparable to non-profit space at Fort Mason Center than to non-profit space in these other areas.

- *Similar Tenant Mix:* Fort Mason Center is currently leased to a large and diverse group of non-profit and cultural/educational tenants. Presidio tenants envisioned under the GMPA would be closer to tenants occupying non-profit and cultural/educational space at Fort Mason Center than to tenants at any other single location in San Francisco.

- *Similar Limited Public Transportation Service:* Like the Presidio, Fort Mason Center is not located near San Francisco's major public

transportation networks: the Bay Area Rapid Transit (BART) and the municipal railway system (MUNI). Tenants seeking leasable space tend to prefer locations near public transit to save on transportation costs. Thus, they are likely to pay more for locations near these systems and less for locations not near these systems. This factor would tend to limit achievable rents at the Presidio because of its limited direct access to public transit.

Tenants at Fort Mason Center pay an average annual rent of $9 per square foot, triple net (NNN). At Fort Mason Center, operating expenses are subsidized (i.e., tenants only pay a fraction of utility costs). At the Presidio, tenants would also be charged a Service District Charge (SDC), bringing total annual occupancy costs to $12.60 per square foot. In response to public comments, Sedway Group expanded its research of total occupancy costs for non-profit space throughout San Francisco from what had been done to develop the assumption used in the Draft EIS financial analysis. According to an August 2001 report by CompassPoint Non-profit Services (CompassPoint), a consulting and training firm serving non-profit organizations, the average annual rent in 2000 for non-profit organizations in San Francisco was between $10 and $13 per square foot (NNN). These comparisons are summarized in the table below.

Tenant Occupancy Costs	PTMP Financial Model	Fort Mason Center (1)	CompassPoint Survey (2)
Annual Rental Rate/SF (NNN)	$9.00	$9.55	$10.00 - $13.00
Operating Expenses or SDC/SF	$3.60	$0.20	$2.00 (3)
Total Occupancy Costs/SF	$12.60	$9.75	$12.00 - $15.00 (4)

Notes:
Data as of October 2001. Source: The Fort Mason Foundation.
Data as of 2000. Source: CompassPoint Non profit Services.
Sedway Group estimate.
According to personal communication with Jeanne Peters, one of the principal investigators for the August 2001 CompassPoint report, non-profit organizations of all types in San Francisco in late 2001/early 2002 generally could afford to pay between $13 and $18 per square foot per year (assumed Full Service), with tax-exempt organizations paying at the lower end of this range.

Based on this information (and the Presidio's relative distance from downtown business districts and lack of access to public transportation), Sedway Group recommended the Trust use $9 per square foot per year in triple-net rents ($12.60 in full service rents) as the financial modeling assumption for non-profit and cultural/educational tenants at the Presidio. This rent assumption is reasonable.

FI-5. ***Rent Assumption for Office Space Versus Cultural/Educational Space***

The Sierra Club suggests that the financial planning model use the cultural/educational rental rate of $9 per square foot per year (NNN) in the Final EIS for all office space in all of the EIS alternatives. Another commentor suggests that, to ensure affordability to arts and other cultural/institutional tenants, the Trust should commit to leasing at rent levels shown in the financial planning model. The commentor suggests that leasing policies must include a provision for below-market rents for arts, cultural, and institutional uses that provide programmatic contributions to the Presidio.

Response FI-5 – There is no rational basis for applying the model's rent assumption for cultural/educational space to all office space in all alternatives. For an explanation of why $9 per square foot per year (NNN) was applied to office space in the No Action Alternative (GMPA 2000). Refer to Responses FI-4, FI-18 and FI-20.

The financial model's office rental rate assumptions were developed by the Trust's financial consultants, Sedway Group. The model assumes there is no Class A office space at the Presidio. The model's Class B and Class C office rent assumptions are based on an historical trendline, as described in Response FI-2. To prepare a conservative estimate, Class B and C office space rates are based upon a seven-year rental rate trend for this type of space outside the central business district of San Francisco. These data showed an average annual asking rate of about $29 per square foot (full service) for Class B space and about $23 per square foot (full service) for Class C space. Using these figures as guides, the model assumes an average annual asking rate of about $30 per square foot (NNN) for Class B space and about $20 per square foot (NNN) for Class C space.

The Trust determines actual rent levels on a case-by-case basis, depending on the use and space involved, and cannot commit to future leasing at the rates assumed in the PTMP financial model. Again, the model is a planning tool designed to compare the long-term financial performance, particularly the revenue – generation capacity, of different alternatives. Its assumptions are being used solely for the purposes of comparing plan alternatives, not to establish actual leasing terms, budgets, or other specific financial implementation criteria. Also, a single "market rate" will not apply to all cultural/educational tenants. The PTMP land use alternatives allow for a significant amount of cultural/educational space that would include "arts, cultural, and institutional uses which provide programmatic contributions to the Presidio." The total square footage for these types of uses ranges from more than 100,000 square feet (Minimum Management Alternative) to more than 886,000 square feet (Final Plan Alternative). The following table summarizes the total cultural/educational square footage for each PTMP planning alternative:

PTMP Planning Alternative	Square Feet Dedicated to Tenants in Cultural/Educational Pursuits
Final Plan Alternative	886,630 (25%)
Final Plan Variant	620,291 (20%)
No Action Alternative (GMPA 2000)	542,343 (15%)
Resource Consolidation Alternative	655,981 (17%)
Sustainable Community Alternative	809,931 (22%)
Cultural Destination Alternative	920,802 (23%)
Minimum Management Alternative	104,391 (3%)

Note: Percentages represent percentages of total non-residential square footage in each PTMP planning alternative.

The financial model's cultural/educational rental rate assumption is based on average rents for galleries/museums, classroom space, theater space, and non-profit office space in comparable locations in San Francisco. Based upon Sedway Group research, the average monthly rent in October 2000 at Fort Mason Center, the primary market comparable for the Presidio (see Response FI-14), was $0.76 per square foot for galleries/museums, $0.76 per square foot for classroom space, $0.73 per square foot for theater space, and $0.80 per square foot for non-profit office space, for an average of about $0.75 per square foot (or about $9 per square foot per year, triple-net).

The range of uses (tenants) and the quality of building space within the cultural/educational land use category will vary widely, and will influence rental rates. No pre-established rental rates are being set through the PTMP planning process, and no single rate will apply to all leased space within any general land use category.

Commentors who urge the Trust to set lower rents, resulting in less revenues, should consider the results of the sensitivity analysis included in the Draft EIS Financial Appendix, and other sensitivities also included in the Final EIS Financial Appendix in response to comments. These analyses indicate the general outcome – in terms of overall financial performance and time – if revenues are lower than projected or if costs are higher. Under some alternatives, lower revenues would dramatically extend the estimated time it will take to complete the capital program and would even put financial self-sufficiency at risk. Results of these sensitivities are referenced in the description of EIS Alternatives, Section 20 of the EIS.

FI-6. ***Income Generated from Interest on Investments***

Two commentors suggest that the financial model should not have omitted interest on investments as a revenue source. One commentor notes, "The Draft EIS omits 'interest on investments' as a revenue source, even though the Trust's current budget includes it." Another commentor: "The Trust's budget has shown significant interest income for the past two fiscal years. I've been told that actual interest in FY 2001 exceeded the budgeted amount and totaled almost $1 million. It makes no sense, then, to exclude interest income from the PTIP financial model and 20-year spreadsheets in the EIS – especially when the spreadsheets do assume a 2.5 percent interest rate in calculating the 'accrued reserve deficits' and do show, as an annual expense, the interest paid on Treasury borrowings." The commentors conclude that the model may be understating reserves by up to a billion dollars and that including interest income on investments would have a positive effect on the financial outlook of the No Action Alternative (GMPA 2000).

Response FI-6 – It cannot be stated too often that the PTMP financial planning model was designed to compare different planning alternatives, not to predict the Trust's long-term costs and revenues or establish the Trust's long-term budgets. Therefore, certain complicating assumptions were omitted in an effort to simplify the analysis and make the comparison among planning alternatives meaningful. This is true in the case of the "interest on investments" assumption, as well as with other assumptions in the financial planning model.

During the actual implementation phase of revitalizing the park, the Trust will generate investment revenues on cash reserves. Omitting this interest on investments in the PTMP financial model is based on several factors, including the recognition that any long-term prediction of interest rates is largely speculative. Also, the model estimates revenues and expenses in "constant" dollars, meaning that inflation is not factored into the cash flow. Accordingly, any inflationary impact on the interest rate earned on investments would need to be removed from the calculation. For example, removing a 3.00-percent inflation rate from a reasonably safe investment, such as a 10-year Treasury note currently yielding about 5.25 percent, would result in a net interest rate of 2.25 percent. In the context of the overall PTMP financial analysis, this amount of interest income would not have a significant impact on the financial performance of the PTMP planning alternatives.

Finally, the financial model was created *to compare the relative financial performance of several land use alternatives*. Including interest on investments in the financial analysis would affect all of the PTMP planning alternatives equally. Therefore, it was reasonable to omit interest on investments, since it was minimal and would not change the relative financial performance of the PTMP planning alternatives.

As a clarification to these commentors, the Sierra Club is incorrect in stating that the financial model "assume[s] a 2.5 percent interest rate in calculating the 'accrued reserve deficits.'" The "accrued reserve deficit" is not calculated as a percent (i.e., 2.5 percent) of revenues. Instead, for the purposes of financial modeling, the "accrued reserve deficit" is calculated as a per-square-foot charge on occupied space. So, as space at the Presidio is occupied, a per-square-foot dollar amount is assumed to be reserved for every square foot that is occupied. This reserve (also called "set-aside funds," "capital replacement reserves," or "reserve set-asides") pays for ongoing building maintenance costs, replacement of buildings and infrastructure at the end of their useful lives, and unexpected extraordinary costs, such as those associated with a catastrophe or natural disaster. The model assumes that once all capital improvements have been made under the modeling of an alternative, this reserve starts receiving cash and eventually becomes a healthy surplus.

As a last point to these commentors, the interest payments on Treasury borrowing were included in the financial analysis because they follow a fixed schedule that has already been established.

FI-7. ***Effect of Conservative Assumptions on the Need for New Construction***

The NPS comments that the financial assumptions of the PTMP financial model are overly conservative and should be reconstituted. "Such conservative assumptions, combined with understated revenue projections and inflated operating expenses for programs, could potentially influence the level of demolition and new construction to meet the requirement of self-sufficiency. This possible need for new construction threatens the ability of the Trust to meet one of its essential mandates – to preserve the Presidio's cultural and natural resources."

Response FI-7 – The Trust disagrees with the commentor's assertion that the assumptions used in the PTIP financial model are "overly conservative," or that they jeopardize the Trust's mission to preserve the Presidio's resources for public use. Rather, the financial model's assumptions are reasonable and prudent and reflect an approach consistent with the Trust's fiduciary responsibilities as set forth in the Presidio Trust legislation. These reasonable and prudent assumptions have been determined using the "principle of conservatism," a widely accepted accounting principle defined as follows: *"A reporting objective that calls for anticipation of all losses and expenses but defers recognition of gains and profits until they are realized in arm's length transactions. In the absence of certainty, events are to be reported in a way*

that tends to minimize cumulative income."[6] Given the impossibility of making an accurate 30-year financial forecast, the Trust believes it has a responsibility to be conservative in modeling its revenue and expense/cost projections. Furthermore, the Trust believes it would be unwise and irresponsible to use overly optimistic financial assumptions to test the PTMP planning alternatives' relative abilities to satisfy the Trust's financial mandate.

These reasonable and prudent financial modeling assumptions do not "create the need for new construction" in any of the PTMP planning alternatives. In fact, based on the revenue assumptions, newly-constructed buildings generate substantially lower revenues than existing buildings rehabilitated by the Trust. The model assumes conservatively that new buildings would be constructed by third parties and that the Trust would collect ground rent.[7] Under the model, ground rent is assumed to equal 20 percent of building rent (e.g., the model assumes annual rent for retail buildings to be $18.00 per square foot (NNN), whereas the annual rent for land on which new retail buildings are constructed is assumed to be 20 percent of this figure, or $3.60 per square foot (NNN)). In the Final Plan Alternative, for example, ground rent revenues for new construction projects equal less than 3 percent ($2.2 million) of the total stabilized annual operating revenues ($78.1 million).[8] Thus, new construction is not included in the PTMP financial analysis to "make up for" conservative revenue assumptions. Rather, new construction is assumed as one of many planning options to further other planning goals and policies associated with each PTMP planning alternative (i.e., goals and policies that preserve the Presidio's cultural and natural resources).

Finally, the commentor should be reminded that the financial model is not a decision document and will not be used to "influence" specific implementation decisions. Such decisions will require detailed and updated analysis of financial conditions at the point in time they are made, as well as a thorough consideration of non-financial issues and planning objectives.

Assumptions Concerning Operating Expenses and Capital Costs

FI-8. *Operating Expenses as Variable Across Alternatives*

A neighborhood group urges the Trust to reduce the level of its annual operating expenses across the board in all PTMP planning alternatives. A number of commentors also challenge the financial model's assumption of constant operating costs for all alternatives over certain cost categories. The CCSF Planning Department questions the financial modeling assumption of applying constant Year 2001 budget figures for certain cost categories (special events, public safety, finance, insurance, and programs) in each alternative regardless of square footage, residents, employees, and visitors. A neighborhood group asks the Trust to explain why the financial model assumes roughly the same annual operating expenses ($44.3 million per year to $46.3 million per year) for all alternatives.

Response FI-8 – The Presidio is expensive to operate, and an estimated 50 percent of all operating costs are non-discretionary, as illustrated in Chapter Four of the Final Plan. Non-discretionary costs include those associated with public safety (police and fire), property management and leasing, utilities, maintenance and landscaping, financing costs, and insurance. Nonetheless, the Trust is committed to reducing operating costs over time, and related assumptions are incorporated into the financial model (i.e. 10 percent reduction in 2007, 2013, and 2020). In fact, the Trust has reduced operating costs by 12.4 percent between Fiscal Year 2002 and 2003.

[6] Source: Financial Accounting, An Introduction to Concepts, Methods, and Uses, Sixth Edition.

[7] Collecting ground rent is a middle position between selling land and leasing finished building space. The Trust is prohibited by law from selling land and at times may not have sufficient capital resources to refurbish buildings to a finished state. Through a ground lease, the Trust can offer the right to use a land parcel for a definite length of time and can secure a builder/tenant who is willing to invest the necessary capital to undertake improvements. The ground rent is the annual payment to the Trust for land value. Land value is determined by the expected income stream that can be generated from the parcel after taking into account the investment required to generate that income (i.e., capital and operating costs).

[8] This is true after the capital program is completed.

Commentors ask the Trust to modify operating expenses in the financial model according to differences in square footage among the alternatives. In response to these comments, the Trust re-examined the financial model's initial assumptions about operating expenses and conducted a sensitivity analysis that is included in the Final EIS, Appendix K (Financial Analysis). The result of this re-assessment was a decision to continue to use generally constant operating expenses as a modeling baseline across the range of alternatives, as was done in the Draft EIS financial analysis. This approach is based upon several factors. First, the model was created as a planning tool to compare the relative financial performance of different land use scenarios. Its utility lies primarily in its capacity to indicate the revenue-generating potential of different alternatives relative to one another; it does not predict future financial conditions or outcomes. See Response FI-1. Second, the use of generally constant operating expense assumptions is based upon the Trust's continued view that within the range of square footage under consideration (4.7 million to 5.96 million square feet), variations in total operating expenses over the 30-year horizon would not materially affect the relative performance of the alternatives. Third, the model accounts for variation in operating expenses over time, but does so in a manner consistent with the purposes of the model. The approach commentors suggest assumes that the model will be used for other purposes.

Nonetheless, in response to commentors' suggestions to vary operating expense assumptions by square footage differences, the Trust performed a sensitivity analysis to look at this factor's effects. (Results can be found in the Final EIS, Appendix K.) Trust staff examined the Fiscal Year 2002 budget documents to determine functions that might be dependent upon the total amount of building square footage in the park, and determined that about 25 percent of current expenses could vary with building space. This estimate was incorporated into the financial planning model as a sensitivity analysis that assumed that 25 percent of each operating expense category (i.e., facilities, operations, legal, planning, real estate services) varied by the alternative's total square footage.[9] Thus, assuming the maximum total square footage of approximately 6 million square feet, alternatives with less square footage would have somewhat lower total operating expenses.

Changing the operating costs assumptions altered the timing of completion of two alternatives, by between one and five years. Importantly, however, the relative performance of the alternatives did not change in other ways, and varying operating costs by square footage is immaterial to the self-sufficiency outcome of the alternatives. In other words, alternatives with lower square footage performed somewhat better, but not remarkably so. This is because having less square footage reduces the overall revenue generation of the Presidio, which in turn affects the Trust's ability to pay fixed operating costs and capital costs.

In reality, there are many variables that will affect the Presidio's future over the next two to four decades. The financial planning model was designed primarily to compare planning alternatives and not to predict a multitude of financial variables over a 30-year planning horizon. Attempting to adjust operating expenses, as commentors urge, to reflect actual variability and accurate expenses is not possible over the period of the financial planning model nor is it considered material for purposes of a financial model designed to compare planning alternatives. Also, assuming variable operating expenses for different alternatives would make it more difficult for public reviewers to compare one alternative to another.

FI-9. ***Reducing Capital Costs in General and Tying Them to Square Footage***

Commentors suggest generally that capital costs assumed in the model are overstated and should be reduced. Commentors who suggest that capital costs in general are overstated more specifically suggest that the Trust should assume lower infrastructure costs in the Final Plan Alternative. The Sierra

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[9] Two expense categories in the model – releasing reserves and residential affordability subsidy – already vary by the total square footage of the alternatives.

Club states, "The GAO reported that 80 percent of utility and telecommunications upgrades will be completed by the end of FY 2002; the Trust should explain what remains to be done and how it affects the remaining infrastructure expenses shown in PTIP." The Sierra Club also suggests that the Trust reduce the scheduled infrastructure capital costs assumed in the model by $1 million per year to "allow financing 80 percent of the [PTMP] planned infrastructure during the same period."

Response FI-9 – The capital cost assumptions of the financial model are reasonable, are not overstated, and are already tied to square footage variations among the planning alternatives. As with operating expense assumptions, the Trust developed capital cost assumptions, many on a per-unit basis, for use in the PTMP financial planning model. These assumptions are based on a combination of experience implementing Presidio capital improvement projects and reasonable estimates. Per-unit capital cost assumptions are the same across all PTMP planning alternatives. For example, the cost of rehabilitating one square foot of non-residential space, or the cost of creating one acre of new open space, is the same across all PTMP planning alternatives. In this way, capital costs are in fact tied to square footage, because as square feet of rehabilitated building space or acres of restored open space vary across the range of alternatives, the unit capital costs are applied to each alternative's unique facts so that in the end the total capital costs of each alternative vary in comparison to one another. See also Response FI-22.

As with the operating expense assumptions, this methodology was followed for capital costs in order to make the comparison among PTMP planning alternatives meaningful. In actuality, capital costs will be higher or lower than the modeling assumptions. Also, it is difficult to accurately forecast capital costs associated with historic buildings, aging infrastructure, and natural resource enhancements because so many of the costs depend on details of a building's condition, the condition of a utility line, or the nature of the natural resource program designed.

In response to comments, the Trust re-examined the infrastructure capital cost assumptions originally developed for the PTMP financial planning model. At the time the cost assumptions were developed for modeling purposes, they were based upon the best available information. Some cost assumptions, like infrastructure capital cost assumptions may be too high and others too low. See Response FI-31. Cost estimating, particularly over a long planning horizon, is inherently uncertain, and in general, estimates that may be high are likely to be reasonably offset by others that are low. A change in this assumption would have been made across the board for all alternatives and therefore would have had an equal effect across the range. For this reason, a change in this assumption would not have provided new or different information in this context, where the model is used only as a comparison tool rather than prediction of financial results.

The assumption of relatively high front-end infrastructure costs is reasonable for other reasons. As a general principle of land use planning, in master-planned developments, the infrastructure backbone is typically developed first so that the rest of the development can be built and serviced. Thus, there is typically a very large up-front investment in capital costs during the initial years of the development process. These costs are then amortized over several years as project revenues are generated and the development stabilizes.

A similar concept is applied under the PTMP financial model. Capital costs are spread over the planning period according to an assumption that is consistent across all alternatives, and capital projects are then funded according to a scheduling assumption. The modeling schedule places a high priority on the park infrastructure improvements needed to support building use and occupancy, which in turn generates cash early in the planning process so that other capital projects can be funded and completed during the later years of the planning alternative. For this reason, the model assumes that as cash becomes available, residential building rehabilitation is funded first, followed by park-wide infrastructure improvements. Thus, infrastructure projects are funded under the model as cash becomes available. Annual capital costs in the PTMP financial analysis cannot be reduced, as the Sierra Club suggests, simply by spreading them over a larger number of years. To do so, one must assume a different purpose for the financial planning model.

FI-10. ***Assumptions About Third-Party Financing***

The NPS and the Sierra Club comment that the Trust has unrealistically overstated rehabilitation capital costs by assuming in the financial model that all building rehabilitation will be financed by the Trust. The NPS suggests changing this assumption because it is reasonable to assume that private investors may assume some of these costs under a ground lease scenario that would allow for capture of investment tax credits for historic building rehabilitation. Also, one commentor suggests that the Trust include in its financial analysis tenant contributions (in the form of in-kind or in-lieu fee contributions) needed for park programming.

Response FI-10 – The Trust agrees that, during plan implementation, private investors will likely finance some building rehabilitation projects under ground lease-type arrangements. See Response FI-7. In response to comments, the importance of a balanced approach to Trust-funded and third-party-funded rehabilitation projects is discussed in Chapter Four of the Final Plan.

The Trust has decided not to change the PTMP financial modeling assumption regarding third-party financing (i.e., the assumption that the Trust finances all building rehabilitation in all alternatives). This is because the goal of the model was not to predict the proportion of building improvements that would be financed by third parties, but incorporate a reasonable assumption that could be applied across all alternatives so that a meaningful comparison could be made. The assumption allows for the meaningful comparison among alternatives, even if actual implementation differs.

Although the baseline model assumption was not modified in response to public comments, the Trust conducted a sensitivity analysis to test and show the effect of a change in the third-party financing assumption on the relative performance of different alternatives. See Final EIS, Appendix K, Financial Analysis Technical Memorandum. The sensitivity analysis assumed that the rehabilitation of some non-residential building clusters was financed by third parties. The primary advantage of this revised assumption is that third parties can rehabilitate buildings at the Presidio at any time, regardless of the availability of Trust revenues. Trust-funded rehabilitation can only be undertaken if the Trust has sufficient cash available at the time to pay for the improvements. Third-party financing can thus accelerate the pace of rehabilitation and revenue generation at the Presidio, and it can proceed even while other Trust-funded rehabilitation is occurring simultaneously. This advantage, however, must be weighed against a disadvantage: buildings that are rehabilitated by third parties generate lower rents for the Trust than buildings that are directly rehabilitated and leased by the Trust. Third parties who invest in rehabilitating buildings expect a discount in rent to account for their capital investments. For the purposes of the PTMP financial model only, it is assumed that this discounted rent equals 20 percent of market rent.

As demonstrated by the sensitivity analysis, assuming some third-party financing affects the financial outcome of the modeled alternatives in three important ways: (1) total capital costs are reduced, (2) building rehabilitation is accelerated, and (3) annual revenues decline because buildings rehabilitated by third parties generate less revenue for the Trust. Thus, there is a trade-off associated with third-party financing. While third-party financing can help the Trust lower its capital costs and rehabilitate its buildings within a shorter timeframe, it also reduces the revenue-generating potential of the Presidio's buildings over the long term. For a more complete discussion of the effect of the sensitivity analysis on different alternatives, refer to the Financial Analysis Technical Memorandum in Appendix K of the Final EIS.

The Trust has also chosen not to include tenant contributions for park programming (in the form of in-kind or in-lieu fee contributions) in the financial analysis assumptions. Requiring tenant programmatic contributions, either as services or fee surcharges, is effectively an alternative form of rent. These fees or services would be a "cost of doing business" at the Presidio, and rents would need to be adjusted downward accordingly in order to remain competitive with other parts of San Francisco (i.e., where tenants do not have to pay such fees). Thus, in the comparison of alternatives, if these costs were accounted for by first reducing assumed rents and then adding them back as assumptions regarding in-kind or in-lieu fee contributions, it would not have altered the outcome of the financial analysis comparisons.

FI-11. ***The Presidio Trust's 2002 Operating Budget***

The Sierra Club suggests that the financial model assumptions should reflect decreases in the Trust's 2002 operating budget. "The 2002 operating budget for the Trust has been adopted, showing a $4 million reduction from the levels

shown in the PTIP financial model in key operating costs....The Sierra Club urges the Trust to include this $4 million reduction in selected operating expenses in the preferred alternative as the most recent and reliable level of operating expenses."

Response FI-11 – The Trust adopted the commentor's suggestion. The PTMP financial analysis for all alternatives in the Final EIS was updated to reflect the Presidio Trust's Fiscal Year 2002 budget estimate. This budget estimate is $4 million less than the budget estimate in the Draft EIS, as the commentor notes. See Response FI-3 for a description of updates to the baseline financial model.

FI-12. ***Natural Lands Management Costs***

The NPS comments that the Trust should transfer natural lands management to the NPS in order to reduce Trust expenditures in this category.

Response FI-12 – For purposes of the financial modeling of the PTMP alternatives, the Trust did not assume the transfer of natural lands management to the NPS. To have assumed in the model that the NPS would or could fund open space and natural resources enhancements and management would have been inconsistent with the model's basic principle of conservatism, and entirely inappropriate. Had the Trust assumed the transfer of natural lands management and associated costs to the NPS, the financial planning model would have eliminated millions of dollars in operating costs and in open space and natural resource-related capital expenditures over its 30-year term. It is not clear that the NPS would have the ability to absorb these costs. In addition, Congress created the Trust to protect, preserve, and enhance the resources of the Presidio and to use self-generated revenues to accomplish these goals; it would be a failure of the Trust's fiduciary charge to ignore natural lands management costs on the assumption that they could be covered by the NPS. For further discussion of this issue, refer to Response OS-5.

Various Residential Assumptions

FI-13. ***Rehabilitation and Subdivision Costs***

The Sierra Club comments that the Trust should modify residential building capital cost assumptions in the financial model to reflect the amount of rehabilitation and subdivision work in each PTMP planning alternative.

Response FI-13 – The residential building capital costs in the financial model do, in fact, reflect an assumed level of rehabilitation and subdivision work for each PTMP planning alternative. The Trust consulted with professionals experienced in estimating residential building capital costs. For example, residential rehabilitation costs for each PTMP planning alternative were calculated using unit-cost estimates for specific building types (e.g., masonry, wood frame) developed by the Presidio Trust Facilities Department. These estimates were based on experience rehabilitating units in the Presidio's residential neighborhoods. The basis for the financial model's subdivision cost assumption was a report by an architectural consultant with experience in rehabilitating and subdividing historic residential structures. The consultant estimated the potential for subdividing different types of structures and estimated conversion costs (unit cost) associated with subdividing Presidio housing. The estimated unit cost was not considered precise enough for budgeting purposes, but provided a reasonable basis for assumptions used in the financial model. For more information about these rehabilitation and subdivision cost assumptions, please refer to the Final PTMP Financial Model Assumptions and Documentation binder (dated May 2002) located in the Trust offices.

The amount of residential space (both number of units and total square footage) that was assumed to be rehabilitated or created by dividing large units into smaller units in each PTMP planning alternative is presented in the table below. Those alternatives that assume that a larger number of existing units are subdivided into smaller units have a relatively higher level of residential building capital costs.

PTIP Planning Alternative	Residential Rehabilitation Units Assumed	Residential Rehabilitation Square Feet	Residential Subdivisions Units Assumed[10]	Residential Subdivisions Square Feet
Final Plan Alternative	652	941,781	534	559,778
Final Plan Variant	415	676,119	693	809,910
No Action Alternative (GMPA 2000)	767	1,323,656	0	0
Resource Consolidation Alternative	307	837,247	16	15,226
Sustainable Community Alternative	483	1,207,874	473	506,756
Cultural Destination Alternative	561	843,373	251	278,534
Minimum Management Alternative	1,654	2,431,873	0	0

The second table presents the results of the financial modeling showing the cost of rehabilitating or subdividing the residential space (number of units or total square footage) listed above, by PTMP planning alternative:

PTMP Planning Alternative	Residential Rehabilitation Total Cost	Residential Subdivisions Total Cost
Final Plan Alternative	$41 million	$107 million
Final Plan Variant	$35 million	$158 million
No Action Alternative (GMPA 2000)	$33 million	$0
Resource Consolidation Alternative	$35 million	$3 million
Sustainable Community Alternative	$42 million	$38 million
Cultural Destination Alternative	$37 million	$51 million
Minimum Management Alternative	$57 million	$0

[10] Unit totals represent number of units after subdivision of existing residential space.

It should be noted that the precise number of housing units that can reasonably be created by dividing large units into smaller units, and by converting non-residential space to residential use is not fully understood. For this reason, the Final Plan incorporates a wide range of possibilities, indicating that between 270 and 570 dwelling units or dormitory-type accommodations can be created within existing buildings. See Chapter Two of the Final Plan. Accordingly, the assumptions used for each alternative should be viewed as just that – assumptions. The costs associated with dividing units and converting non-residential space is also likely to be building-specific and therefore will vary greatly. Another cost of dividing large units is the loss in rent during construction. As described in response to comments on housing, the feasibility of dividing units and converting space will depend on the actual costs, and the amount of time it will take to amortize those costs.

FI-14. ***Maximum Feasible Residential Conversions as a Financial Strategy***

The Sierra Club comments that pursuing the maximum number of feasible residential conversions to smaller units is the most efficient strategy to provide replacement housing units at the least cost.

Response FI-14 – See also Response HO-9. Based on results of the PTMP financial analysis, it cannot be definitively concluded, as the Sierra Club argues, that subdividing existing residential units into smaller units is "the most efficient strategy to provide additional housing at least cost," although the Final Plan Alternative identifies subdivision of existing dwelling units and conversion of non-residential space to residential use as ways to provide replacement housing.

The capital investment needed to subdivide existing residential units, many of which are historic and therefore require special consideration under the NHPA, is very high. Based upon a preliminary estimate by a qualified architectural consultant who has experience with historic and non-historic residential subdivisions and conversions, capital costs could range from roughly $140 to $300 per square foot for historic buildings, and from roughly

$125 to $250 per square foot for non-historic buildings.[11] It is likely that projects falling at the low end of this range will prove feasible, and the financial planning model assumes a cost of $200 per square foot. This generalized cost assumption was the best available information, and is greater than the estimated cost of $175 per square foot to build new residential units (although either cost may ultimately be borne by a third party instead of the Trust, if the subdivision/conversion and/or new construction is undertaken by residential developers). The Final EIS (Appendix K, Financial Analysis Technical Memorandum) contains further discussion of the relative implications of residential rehabilitation/conversion versus new construction under the model.

In actuality, the decision about the "most efficient strategy" for replacing housing units is much more complex than the model assumes. This decision will be made only as part of specific future proposals for Final Plan implementation, and will depend upon more than simply a unit-cost comparison. In many cases at the Presidio, the incremental revenue gained from subdividing existing residential units may not be great, and it could take decades before the incremental revenue covers the subdivision costs. There may be other instances where, from a policy or economic perspective, subdividing the largest existing residential units into smaller units may be an effective strategy. Smaller units (i.e., one- or two-bedroom units) are better suited to meet Presidio-based employee housing demand as well as the broader demand in the San Francisco residential market. In other instances, the policy objective of replacing housing units may be achieved by constructing new, appropriately sized residential units at the Presidio. The PTMP financial model, however, cannot definitively answer this question, because the model was designed to broadly compare land use alternatives. It was not designed to accurately analyze specific future implementation choices and decisions, particularly decisions like these that may have to be made on a building-specific basis.

[11] Page & Turnbull, Inc. and Solomon E.T.C., "Presidio Housing Conversion Study," October 19, 2000 (Methodology section, page 3).

FINANCIAL EVALUATION OF THE NO ACTION ALTERNATIVE (GMPA 2000)

Financial Modeling Assumptions of the No Action Alternative (GMPA 2000)

FI-15. ***Clarification of the No Action Alternative (GMPA 2000)***

One individual states that "hundreds of citizens look forward to seeing the financially viable presentation of the GMPA Alternative [in] the PTIP public review process…."

Response FI-15 – It is not clear from this statement whether the commentor's expectation is that the Trust would be analyzing the GMPA as it was finalized by the NPS in 1994 or whether the Trust would be considering an alternative closely modeled on the 1994 GMPA (i.e., the No Action Alternative (GMPA 2000)). The Trust is responding to this statement to clarify the No Action Alternative (GMPA 2000).

The GMPA 2000 Alternative is the NEPA "No-Action" alternative and has been formulated to include the specifics of the 1994 GMPA as closely as current circumstances allow. The reader should refer to Responses EP-14 and AL-1 for full clarification of the No Action Alternative (GMPA 2000). The 1994 GMPA, as adopted by the NPS, included several critical financial assumptions that are no longer true – such as receipt of continued annual federal appropriations and the existence of the Sixth U.S. Army as a Presidio tenant – and assumed a level of philanthropic support that cannot be assured. As a result, the 1994 GMPA has been updated to reflect significant financial changes – changes that have important implications for the financial viability of the Presidio. The financial assumptions in the No Action Alternative (GMPA 2000), therefore, have been modified from those in the 1994 GMPA to incorporate the financial limitations set by the Trust Act, to reflect other financial changes that have occurred since 1994, such as new leases and the Lucas Digital Arts Center (LDAC) development agreement for the Letterman site, and to eliminate the assumption that philanthropic gifts will always materialize when needed. Based on these modified assumptions, the financial analysis conducted during the PTMP planning process shows the No Action Alternative (GMPA 2000) to be financially self-sufficient and sustainable, as

are all the other EIS alternatives. Without these modified assumptions, the 1994 GMPA would not have met the threshold criterion of financial self-sufficiency or represented a true "no action" condition.

FI-16. ***Financial Assumptions of the No Action Alternative (GMPA 2000))***

A number of commentors state that the Trust structured the No Action Alternative (GMPA 2000) in such a way as to place it at a financial disadvantage when compared to other options. They suggest that the Trust had arbitrarily constructed the No Action Alternative (GMPA 2000) differently from all other options in order to bias the planning process outcome. ("It is … discouraging to see that … the GMPA 2000's finances have been arbitrarily handicapped – and that the Trust has played on this handicap to argue in favor of a much less desirable PTIP alternative.") One commentor notes that the Trust had made it "appear as if paying for parkwide capital improvements and creating a reserve fund will take much longer under the GMPA 2000 alternative. It also leads to the GMPA alternative showing a small negative net cash flow in FY 2013 (EIS page 375). And the text of the Draft EIS plays on this by claiming that the GMPA 2000 Alternative is financially 'more marginal than some other alternatives' (Draft EIS at pages 374-377 and elsewhere)."

Response FI-16 – The Trust did not, as commentors assert, arbitrarily place the No Action Alternative (GMPA 2000) at a financial disadvantage. On the contrary, the Trust took considerable pains to develop the No Action Alternative (GMPA 2000) as suggested by commentors in the scoping period. That is, to craft an alternative as close as possible to the 1994 GMPA that would also meet the requirement of financial self-sufficiency. The Trust then developed and applied financial assumptions that reasonably represented the assumed land uses of each alternative and applied them, consistently and fairly, to analyze the financial performance of each EIS alternative.

There are a number of reasons why the No Action Alternative (GMPA 2000) did not perform as well financially as the other PTMP planning alternatives, and these reasons stem from the land use program and policies outlined in the 1994 GMPA. For example, the 1994 GMPA called for an emphasis on leasing to tenants who would further a mission related to global environmental, cultural, and social themes. As a result, the No Action Alternative (GMPA 2000) assumes a greater percentage of non-profit tenants who, based on market research, would not on average pay rent comparable to other San Francisco Class B and Class C office rents. This leasing approach affects the revenue-generating potential of the No Action Alternative (GMPA 2000). In addition, the 1994 GMPA called for the demolition of Wherry Housing as soon as it was no longer used by military personnel. Thus, in the preliminary financial analysis made public in December 2000 during the scoping period, Wherry Housing was assumed to be demolished earlier under the No Action Alternative (GMPA 2000) than under the other EIS alternatives, because the Army had by 2001 already largely vacated the Presidio and was not using Wherry Housing. In response to public scoping comments, and because the No Action Alternative (GMPA 2000) was not financially viable with complete demolition of Wherry Housing in 2004, the Trust revised its assumption in the Draft EIS financial analysis. The analysis of the No Action Alternative (GMPA 2000) now assumes that Wherry Housing would be fully demolished after the end of the 1994 GMPA's plan horizon in 2010. (The model assumes that demolition would occur in 2012.) As a result, the No Action Alternative (GMPA 2000) meets the test of financial self-sufficiency and remains as true to the 1994 GMPA as possible, but does not perform as well financially as other alternatives. See Response FI-17, below, for more discussion of this issue.

FI-17. ***Timing of Wherry Housing Demolition in the No Action Alternative (GMPA 2000)***

A number of commentors suggest that the Trust had arbitrarily varied the timing of demolition of revenue-generating facilities, such as Wherry Housing. They believe that the Trust unnecessarily biased the financial analysis of the No Action Alternative (GMPA 2000) by assuming an earlier demolition of Wherry Housing in that alternative than in other alternatives. ("There is no justification for this handicapping of the GMPA 2000! It is inconsistent with the 1994 GMPA, which calls for Wherry to be demolished in the final phase of converting the Presidio into a park. This handicapping replicates one of the most serious flaws in the PTIP financial analysis presented to the public during scoping … [and] makes it appear that the GMPA would take longer than the Draft Plan to fund capital improvements and create a reserve fund. [It is] … disturbing to see that the text of the Draft

EIS plays on this appearance, claiming that the GMPA 2000 is financially 'more marginal than some other alternatives.' I believe that this appearance of marginality is in fact an illusion. And I believe it is unfair to the public for the EIS to make these claims.") They believe the Trust should have "level[ed] the playing field" by analyzing the alternatives with the same assumption about the timing of demolition of Wherry Housing across all alternatives. A letter from the CCSF Planning Department urges the Trust to consider changing the Wherry Housing demolition assumption for the No Action Alternative (GMPA 2000). ("Wherry Housing is a significant revenue source that has a positive effect on the financial performance of any alternative and the Draft Plan alternative was given an artificial boost by assuming different phasing of demolition.")

Response FI-17 – The assumption for the timing of the Wherry Housing demolition in the No Action Alternative (GMPA 2000) is based on the timing as provided in the 1994 GMPA. As the commentor correctly notes, the 1994 GMPA called for Wherry Housing's full demolition in the final phase of GMPA implementation. The Plan itself (1994 GMPA, page 115) and its implementation strategy (Presidio Building Leasing and Financing Implementation Strategy, July 1994.), published as a separate and supporting volume of the 1994 GMPA, assumed complete implementation of the NPS plan by 2010. For financial modeling purposes, it was assumed that demolition of Wherry Housing would be completed by 2012 under the No Action Alternative (GMPA 2000). This timing assumption is as close as possible to the 1994 plan, and is therefore the assumption that is most consistent with the "continuation of the existing management program" (i.e., the "No-Action" alternative required by NEPA). For more information, see Response EP-14. Application of this reasonable and necessary assumption cannot be labeled "an artificial boost."

Nevertheless, as the commentors note, the timing of Wherry Housing demolition does significantly affect revenue generation and therefore the relative financial performance of all the alternatives. The Trust chose to address commentors' assertions of prejudice and their requests to delay the timing of demolition, by conducting sensitivity analysis incorporating a phased demolition of Wherry Housing under the No Action Alternative (GMPA 2000) identical to the demolition timing assumptions for the Final Plan Alternative. The sensitivity analysis assumed demolition of the residential units as follows: one-third in 2012, one-third in 2020, and one-third in 2030. Phasing the demolition of Wherry Housing in this way positively affects the financial performance of the No Action Alternative (GMPA 2000) after 2012. The capital program would be completed by approximately 2030, about 10 years earlier than under the baseline No Action Alternative (GMPA 2000). Also, it is estimated that revenues would be fully funded by between 2035 and 2040, while under the baseline No Action Alternative (GMPA 2000) the revenue between 2050 and 2055.

A second sensitivity analysis was conducted on the No Action Alternative (GMPA 2000) incorporating the phased demolition of Wherry Housing between 2012 and 2030. The sensitivity analysis also incorporated increased capital costs 15 percent above the baseline capital cost figure) and reduced non-residential rental rates. See Response FI-3 for a description of the revised rental rate assumptions. In this sensitivity analysis, the benefits of revenues associated with maintaining a portion of Wherry Housing over a longer period are offset by the increased capital costs and reduced non-residential revenues. The time required to complete the capital program remains the same as in the baseline scenario, estimated at approximately 2040. Because of reduced non-residential revenues over the long term, the time required to complete the implementation phase is extended slightly, from between approximately 2050 and 2055 in the baseline scenario to approximately 2055 in the sensitivity.

FI-18. *Non-Residential Rent Assumptions in the No Action Alternative (GMPA 2000)*

Commentors suggest that the financial model's non-residential rent assumptions in the No Action Alternative (GMPA 2000) is too low, thereby creating a biased view of the alternative. These commentors indicate that the Trust's $9-per-square-foot-per-year assumption for mission-related tenants was "below market" as compared to other assumed average office rents and should be increased. One commentor states that the Draft EIS "fails to explain" why in this alternative more than half the park's non-residential building space (73 percent of the 3.69 million square feet) is assumed to be rented to mission-related tenants at below-market rates. He suggests that, because the model assumes the Trust will fund renovation of existing

buildings, the assumption of below-market rents from mission-related tenants should be changed. This commentor suggests a "middle-ground approach, with average [annual] rents higher than $9 [per square foot] but lower than market rate" proposing "$15 [per square foot], on average, for Class B office space and $3 [per square foot] (or even zero!) for Class C office space...."

Response FI-18 – It is not accurate to say that rent assumptions in the No Action Alternative (GMPA 2000) are "below-market." The assumption of $9-square- foot is "market rent" for San Francisco non-profit tenant space (i.e., the type and quality of office space most commonly affordable by non-profit tenants). This space is most comparable to the kind of space envisioned in the 1994 GMPA. Hence, the Trust cannot simply assume higher rents and expect to attract the mission-related tenants envisioned in the 1994 GMPA. If rents were simply increased to "market rates" for San Francisco commercial office space or even to a rate higher than what non-profit tenants could pay elsewhere for comparable or better space, the tenant base at the Presidio would be much different than the tenant base envisioned in the 1994 GMPA (i.e., there would likely be fewer mission-related tenants).

For all alternatives, the financial model assumes that non-profit office space and/or cultural/educational space would be leased on average at $9 per square foot, triple-net (NNN), in annual rent. Sedway Group's assumption of $9 per square foot per year (NNN) was developed and based on what tenants currently pay in average triple-net rents at Fort Mason Center (i.e., the primary comparable market), located close to the Presidio. The reasons for using Fort Mason Center as the basis for the model's rent assumption for non-profit space and cultural/educational space at the Presidio are described in Response FI-4, above

FI-19. ***Non-Residential Revenue Yield Under the No Action Alternative (GMPA 2000)***

One commentor also questions the financial model's non-residential revenue results for the No Action Alternative (GMPA 2000). This commentor states, "It appears that the $14 million annual non-residential rent total in the GMPA 2000 spreadsheet should be closer to at least $28 million. And if the Trust anticipates charging more than $9 [per square foot] per year for at least some non-residential tenants, then even the $28 million annual total may be much too low ... Note that the GMPA 2000 spreadsheet ([Draft] EIS, Appendix J) shows a much lower annual non-residential rent total; only some $14 million – not $28 million – in FYs 2011 through 2020." The commentor asks the Trust to explain this apparent discrepancy.

Response FI-19 – The estimated non-residential revenues in the No Action Alternative (GMPA 2000) are correct based on the model's rental rate assumptions and assumed schedule of building rehabilitation. Other than a limited amount of Treasury borrowing ($50 million) that is assumed to be fully expended in the Trust's initial years, the analysis does not assume that the Trust would borrow money to fund capital projects. This assumption is based upon provisions of the Trust Act and the status of Treasury borrowing authority in Fiscal Year 2000 when modeling assumptions were developed.[12] As a result, the model assumes that currently vacant buildings can only be rehabilitated as revenues/cash become available. The unrehabilitated and vacant buildings do not generate rent revenues in the financial model. However, the commentor assumes that all non-residential buildings would be generating revenues between 2011 and 2020. This would require that all non-residential buildings be rehabilitated by 2010, which is an unrealistic assumption.

In the Draft EIS, it is estimated that only about 50 percent ($139 million) of the $276 million in non-residential rehabilitation would be funded by 2013 under the No Action Alternative (GMPA 2000) based on the revenues available to fund rehabilitation work. Non-residential revenues would not be

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[12] Since the time that the PTMP financial model was developed, the Trust Act has been amended to allow additional Treasury borrowing authority. However, receipt of any additional borrowed funds is dependent upon Congressional appropriation. In the current war-time economy, the Trust has been given indications that its base-level appropriations could be at risk and any further appropriation to authorize additional borrowing could be unlikely. Therefore, the model assumes only $50 million (i.e., the amount already appropriated) in borrowed funds for each alternative, rather than assuming the higher amounts authorized in the Trust Act. This assumption is consistent with the principle of conservatism guiding the financial analysis.

stabilized until all buildings have been rehabilitated, which would occur in approximately 2035 under the No Action Alternative (GMPA 2000). At that point (approximately 2035), stabilized non-residential revenues would total roughly $18.9 million (not including SDC). In 2020, non-residential revenues would total $14.7 million, because a substantial number of buildings would not yet be rehabilitated due to insufficient available cash in the preceding years.

The commentor suggests that annual non-residential revenues under the No Action Alternative (GMPA 2000) should be closer to $28 million. This assertion is based on multiplying $9 per square foot by about 3.1 million square feet of non-residential space.) The methodology used to calculate this figure is incorrect for the following two reasons.

First, non-residential revenues are calculated by applying an annual rental rate for each land use to the amount of *occupied* square feet of that land use during each year. The annual rental rates vary from $5 per square foot for recreational space to $26.75 per square foot for lodging space. The commentor assumes that 2.69 million square feet of non-residential space (not including LDAC) generates revenues. This is incorrect. Not all of this space generates revenues. In fact, significant portions of this space, such as the following do not generate revenues:

- Approximately 400,000 square feet are set aside for use by the Trust, the NPS, and infrastructure facilities. These uses do not generate rental revenues. (This assumption is consistent across all EIS alternatives.)

- An additional 290,000 square feet represents conference space, which is assumed to generate no rental revenues. (This assumption is consistent across all EIS alternatives.)

- While lodging space generates significant per-unit rents and the land use program for the No Action Alternative (GMPA 2000) includes a large amount of lodging space, a substantial portion of this space (230,000 out of 362,000 total square feet) is located in the assumed Fort Scott Presidio Institute conference center. Based on a previous analysis, this Fort Scott lodging space is assumed to generate no rental revenues. (This assumption is consistent across all EIS alternatives.)

- About 170,000 square feet are assumed to be new construction. New construction generates ground-lease revenues that represent only 20 percent of building revenues. (This assumption is consistent across all EIS alternatives.)

For these reasons, approximately 1.1 million square feet of the 2.8 million non-residential square feet (excluding the LDAC) under the No Action Alternative (GMPA 2000) are assumed to generate minimal or no rental revenues.

In the updated financial analysis conducted for the Final EIS, stabilized non-residential revenues are not reached until all buildings have been rehabilitated, which would occur in approximately 2040 under the No Action Alternative (GMPA 2000). At that point, stabilized non-residential revenues would total roughly $33.0 million. In 2020, non-residential revenues would total $21.4 million, because a substantial number of buildings would not yet be rehabilitated due to insufficient available cash in the preceding years. Therefore, the estimated non-residential revenues for the No Action Alternative (GMPA 2000) in both the Draft EIS and Final EIS analyses are correct based on the rental rate assumptions and estimated timing of building rehabilitation assumed for purposes of consistent modeling of alternatives.

Second, the commentor assumes that all non-residential buildings would be generating revenues between 2011 and 2020. This would require that all non-residential buildings be rehabilitated by 2010, an assumption that cannot be made under the prioritization rules of the model. The financial planning model assumes that only about 50 percent ($139 million) of the $276 million in non-residential rehabilitation would be funded by 2013 under the No Action Alternative (GMPA 2000) based on the revenues available to fund rehabilitation work. Non-residential revenues would not be stabilized until all buildings have been rehabilitated, which would occur in approximately 2035 under the No Action Alternative (GMPA 2000). At that point (approximately 2035), stabilized non-residential revenues would total roughly $18.9 million (not including SDC). In 2020, non-residential revenues would total $14.7 million (not including SDC) because a substantial number of buildings would not yet be rehabilitated, due to insufficient available cash in the intervening years. Therefore, the estimated non-residential revenues under the No Action

Alternative (GMPA 2000) are correct based on the rental rate assumptions and estimated timing of building rehabilitation.

FI-20. ***Total Revenue Yield in the No Action Alternative (GMPA 2000)***

Commentors suggest that the No Action Alternative (GMPA 2000) could generate much more revenue if the financial model assumed non-residential market-rate rents. ("[The EIS] also fails to explain why at least some of the types of tenants identified in the 1994 GMPA can't pay more than $9 [per square foot], and it fails to show how much more revenue the GMPA 2000 could generate if just some of the tenants (for example, for retail and lodging uses) paid market-rate rents.") The commentor estimates that the No Action Alternative (GMPA 2000) could generate $51 million annually from non-residential leases, or $23 million more than the total projected in the financial analysis of the alternative in the Draft EIS. Another commentor estimates an even greater annual revenue increase of $26 million per year. "Applying market-rate rents to the GMPA 2000 building space (according to the building-use designations shown in [Draft] EIS Appendix D) would, according to my calculations, produce an average rent of roughly $19 [per square foot per year] – $10 more per [square foot] than the $9 [per square foot in] rent assumed under the GMPA 2000. And $10 times 2.69 million [square feet] is $26 million more potential annual rent."

Response FI-20 – It would have been unreasonable to assume in the financial model that all program-enhancing, mission-related tenants would pay higher rents than the assumed $9 per square foot per year (NNN), as discussed in Response FI-18, above. The 1994 GMPA (page v) encompassed a vision that dictated leasing to a specific tenant mix: "to house a network of national and international organizations devoted to improving human and natural environments." Together, these organizations would create "a global center dedicated to addressing the world's most critical environmental, social, and cultural challenges." Most for-profit businesses do not have a mission statement focused on environmental, social, or cultural causes. Therefore, the tenant mix in the No Action Alternative (GMPA 2000) was assumed to encompass a higher percentage of non-profit organizations, which would more likely further the 1994 GMPA's goals. Non-profit tenants, often for reasons of affordability, tend to occupy space that cannot command the highest commercial rents (i.e., these organizations occupy bottom-tier Class B and C space at accordingly lower rents). As a result, the No Action Alternative (GMPA 2000) as presented in the Draft EIS assumed a greater percentage of non-profit tenants, at reduced rents, than the other Draft EIS alternatives. To make a fair and meaningful comparison among alternatives, all tenants considered to be mission-related tenants were assumed to pay $9 per square foot per year (NNN) in rent as were all tenants in the cultural/educational land use category. See Responses FI-4 and FI-5 for discussion of the derivation of these rent assumptions.

In actuality, some mission-based tenants will likely pay more or less than $9 per square foot per year (NNN). Thus, $9 per square foot per year is a reasonable assumption – based on available data and expert opinion – that represents an overall average rent for about 820,000 square feet of building area in the No Action Alternative (GMPA 2000), and for different amounts of square footage in other Draft EIS alternatives. It would have been unreasonable to assume that non-profit tenants would pay the same rents as for-profit tenants, who often desire and can pay for higher-quality space at higher rents. It would also have been unreasonable to assume that the Presidio would attract only those non-profit organizations that could pay the same rents as for-profit tenants.

Commentors may have assumed that the revenue yield of the No Action Alternative (GMPA 2000) was unduly low because the Draft EIS (Section 2.5, page 30) reported a high percentage (73 percent) of non-residential space assumed to be leased to GMPA mission-related tenants at $9 per square foot per year. This reported percentage was in error; 34 percent of non-residential space was actually assumed occupied by GMPA mission-related tenants, and the financial results in the Draft EIS reflect revenue yield based on the lower 34-percent assumption. In the Final EIS, due to the factual updates of the PTMP financial model, a slightly lower percentage (24 percent) of non-residential space is assumed to be occupied by GMPA mission-related tenants, yielding revenue at $9 per square foot per year. Other non-residential land uses in the No Action Alternative (GMPA 2000) are assumed to generate market rents for those uses. For example, industrial uses on average pay rents of $12 per square foot per year (NNN), retail uses on average pay rents of $18

per square foot per year (NNN), and lodging uses on average pay rents of $26.75 per square foot per year. (These market rents are assumed consistently across all EIS alternatives.) Thus, although commentors assumed revenues to be unduly low for the No Action Alternative (GMPA 2000) the majority of non-residential space in the alternative is assumed to be leased at the "market rates" applied across all alternatives. Furthermore, the percentage assumed to be leased to GMPA mission-based tenants at $9 per square foot per year in the Final EIS (24 percent) is an assumption that is both consistent with the 1994 GMPA vision and relatively conservative, because space that might otherwise be assumed rented at $9 per square foot per year is already dedicated to today's long-term leases at higher market rates under the financial model's factual updates. For these reasons, the revenue yield of the No Action Alternative (GMPA 2000) is neither understated nor unfairly represented in the PTMP financial comparison of alternatives.

FI-21. ***Reallocation of Industrial/Warehouse Space in the No Action Alternative (GMPA 2000)***

One commentor suggests that the Trust should reallocate (i.e., convert) industrial/warehouse space in the No Action Alternative (GMPA 2000) to other higher revenue-generating uses in an effort to increase revenues. ("The Trust should reduce the allocation in the GMPA 2000 to warehouse and industrial use as no longer relevant … By reallocating this space to more reasonable higher rent uses…, the GMPA [2000] would receive more revenue.")

Response FI-21 – The amount of industrial space in the No Action Alternative (GMPA 2000) is based on the land use program as described in the 1994 GMPA. In the Final EIS, the infrastructure land use category was merged with industrial/warehouse space; these uses are very similar and have a low employee-to-square footage ratio. The building uses that fall into this category include general storage and warehouse space, facilities specifically related to the operation of the park's utilities, public safety facilities, and maintenance functions. The 1994 GMPA EIS identified a total of 800,000 square feet in these combined land use categories. The No Action Alternative (GMPA 2000) refined this number to 580,000 square feet to reflect changed circumstances that had occurred since 1994 (such as the rehabilitation of Building 210 rather than Building 35 as the fire station, and the rehabilitation and reuse of several warehouses for other uses such as the Exploratorium's offices).

Further, in the No Action Alternative (GMPA 2000), the only non-residential uses that assume higher per-square-foot revenues than industrial/warehouse space are retail and lodging space. The 1994 GMPA offers no rational basis for assuming conversion of its industrial/warehouse space into retail and/or lodging space. As the No Action Alternative (GMPA 2000) represents the 1994 GMPA as closely as possible (i.e., it incorporates the minimum number of changes), the commentor's suggestion has not been adopted.

FI-22. ***Reduction of Capital Costs for the No Action Alternative (GMPA 2000)***

Commentors generally suggest that capital costs are overstated for the No Action Alternative (GMPA 2000) and should be reduced to more appropriate levels (e.g., program capital costs). As a specific suggestion, the Sierra Club asks that the lodging and conference space in the No Action Alternative (GMPA 2000) be substantially reduced and reallocated to other uses to lower rehabilitation capital costs. The Sierra Club and NRDC both suggest that the Trust should not have assumed $10 million in annual capital costs for programs under the No Action Alternative (GMPA 2000). They explain that the 1994 GMPA called for limited capital expenditures for programs, and did not call for the construction of new buildings for programs. The Sierra Club proposes that annual program expenses should be no more than $2 million for the No Action Alternative (GMPA 2000) rather than the $10 million included in the Draft Plan.

Response FI-22 – The unit capital costs applied to the No Action Alternative (GMPA 2000) are the same as those used for all the other EIS alternatives, and overall costs generated by the No Action Alternative (GMPA 2000) land use program vary in comparison to other alternatives. See Response FI-9.

Simply because the No Action Alternative (GMPA 2000) has less total square footage than the other PTMP planning alternatives does not mean that capital costs under this alternative would be much lower. Most park-wide capital costs (e.g., roads, utilities and telecommunications) do not vary significantly by alternative. While some aggregate capital costs (e.g., building

rehabilitation costs) in the No Action Alternative (GMPA 2000) are lower compared to other alternatives, others (e.g., demolition and open space costs) are higher. The capital cost modeling assumptions for the No Action Alternative (GMPA 2000) are reasonable ones for the intended purpose of the model, which is to compare planning alternatives, not precisely predict fine-grained capital cost variations among the alternatives.

The amount of lodging and conference space in the No Action Alternative (GMPA 2000) is based as closely as possible on land uses provided in the 1994 GMPA. The 1994 GMPA EIS did not have a specific land use category for lodging and conference, and instead spread these uses between the use fields of Dormitory and Institution. In updating the GMPA for the No Action Alternative (GMPA 2000), the Trust interpreted the text of the 1994 GMPA and assigned that square footage (from the relevant Dormitory and Institution designations) into the PTMP land use category of Lodging and Conference Space. As this is the "No Action" alternative required by NEPA, it would be irrational and arbitrary to change the lodging and conference land use assumptions simply to achieve a reduction in this alternative's capital costs.

Despite commentors' claims, the program capital cost assumption in the financial model for the No Action Alternative (GMPA 2000) is rational and reasonable. The Trust agrees with commentors that the 1994 GMPA does not call for construction of new buildings for programs, and the program capital cost assumption does not include new construction costs for the GMPA or any other alternative. Rather, the 1994 GMPA included a number of programmatic ideas (e.g., museum uses, cultural centers, galleries, and exhibition space) that will likely require substantial funding for capital improvements. Several significant programming proposals by the NPS indicate the nature of some of the intended program uses under the 1994 GMPA. Congress recently appropriated funds to the NPS and the Trust to evaluate the feasibility of installing a Pacific Coast Immigration Museum and a National Japanese American Historical Society museum within Area B facilities or elsewhere in the GGNRA. Neither proposal currently carries with it funding for implementation, which of necessity would include capital funds to improve existing building spaces to museum standards. Other ideas offered by the NPS and others as consistent with the 1994 GMPA include a Crissy Field Aviation Museum in the hangars at the west end of Crissy Field and a Bay Area Resources Center to serve as an archive to house archeological artifacts and museum specimens and collections. Again, no outside source of funding has yet been identified by the NPS for these facilities, suggesting that implementation of the GMPA would have required capital funds for associated building rehabilitation.

It is reasonable to assume that these and similar or alternate proposed uses would involve significant capital expenditures to improve existing space (including some historic buildings) to what could be specialized exhibition standards. While much of the funding may come from outside (philanthropic) sources, it is not unreasonable to expect there would be some costs to the Trust. For all of these reasons, it is reasonable to assume for purposes of the PTMP financial planning model that, over the 20 to 30-year modeling horizon, capital funding needs for programs, even under the No Action Alternative (GMPA 2000), would accrue to $10 million. This amount should in no way be viewed as a commitment by the Trust, but as a reasonable assumption of expenditure levels over time if sufficient revenues exist.

Nevertheless, in response to the commentors' suggestions, the Trust evaluated the impact of reducing program-related capital costs in the No Action Alternative (GMPA 2000) from $10 million to $2 million. The overall impact on the alternative is minimal; the capital program is reduced from $519 to $511 million, and the estimated date of completion of the capital program remains unchanged at approximately 2040. Because of minor shifts in revenues that are generated in earlier years, the estimated completion of the implementation phase is accelerated slightly to approximately 2050 (from between 2050 and 2055 in the baseline scenario). This change is considered negligible when viewed in the context of the financial planning model's purpose, which is to compare EIS alternatives over an extended time horizon.

Relative Financial Performance of Alternatives

FI-23. ***Financial Prudence of the No Action Alternative (GMPA 2000)***

Several commentors express the opinion that the No Action Alternative (GMPA 2000) is the most financially prudent alternative. As the basis for the opinion, they note that it achieves financial self-sufficiency and is financially sustainable over the long term notwithstanding that more than half the

building space is assumed to be rented at "below-market" rates. One commentor notes, "I believe this clearly shows how easily the Trust can meet its financial goals under the GMPA 2000." These commentors also suggest that the No Action Alternative (GMPA 2000) meets and exceeds the financial self-sufficiency mandate well before the statutory deadline of 2013. These commentors reason that "to be self-sufficient by 2013 under the GMPA 2000 alternative, the Trust will need annual operating revenues of at least $49.3 million to cover $44.3 million in operating expenses, $2 million in program expenses, and $3 million in financing (interest) expenses. The [Draft EIS financial] spreadsheets project that by 2003, annual operating revenues (exclusive of Congressional appropriations) will exceed $56 million! Thus, the financial self-sufficiency revenue target will be more than met ten years ahead of schedule! And the target will be more than met every year from 2003 on…." These same commentors opine that the No Action Alternative (GMPA 2000) is financially prudent because it is less susceptible to market forces. "All other PTIP alternatives than the GMPA 2000 assume much higher market rate rents, putting them – in my opinion—more at the mercy of market forces."

Response FI-23 – To respond to this comment, the Trust must correct the threshold assertion that, under the No Action Alternative (GMPA 2000), tenants would be charged "below-market" rents. Refer to Response FI-18 for an explanation of why this assertion is inaccurate.

The Trust does not agree that the tenant mix under the No Action Alternative (GMPA 2000) is less susceptible to market forces. Every rent-paying tenant is, to some degree, "at the mercy of market forces," as the recent downturn in philanthropic giving demonstrates (i.e., because it coincides with a general downturn in the economy and will affect the financial strength of the non-profit sector). The Trust believes that the best approach to protect against dramatic economic swings is to lease space to a mix of tenants (i.e., from varying sectors) and negotiate beneficial lease terms with tenants who have demonstrated ability (based on financial history) to pay their rent. To reflect the potential outcome if revenues are less than expected or costs are greater than expected, the Draft EIS financial analysis included (and the Final EIS analysis also includes) sensitivity analyses testing the relative strength of each alternative. These analyses indicate that the No Action Alternative (GMPA 2000) cannot bear significant downturns in market rents and still remain viable. A decrease in non-residential revenues of ten percent and a decrease in residential revenues of 5 percent results in marginal self-sufficiency (i.e., revenues exceed expenses by only $1.1 million in 2013). The capital program would be completed between approximately 2045 and 2050, and reserves would not be funded until approximately 2100. See Draft EIS Appendix J, page 10.

There are other reasons why the Trust does not agree with the commentor's characterization of the No Action Alternative (GMPA 2000) as the "most financially prudent" alternative. The No Action Alternative (GMPA 2000), as modeled in the Final EIS, would be financially self-sufficient in that by 2013 revenues are projected to exceed operating expenses by $3.8 million. The alternative would continue to experience a similar slim operating margin between 2013 and 2020, and there would be minimal cash available to fund rehabilitation of other revenue-generating buildings. It is difficult to characterize an operating margin of $3.8 million on annual expenses of $45 million as the most financially prudent operating situation, relative to the other PTMP planning alternatives. This is especially true given the magnitude of capital improvements necessary to revitalize the park. Because the Trust is limited in its borrowing capacity, the money to rehabilitate buildings and complete park-wide capital projects under the No Action Alternative (GMPA 2000) would come from ongoing net cash flow. The smaller the operating margin, the longer the time required to complete the capital program – thereby lengthening the time the park might be exposed to future negative shifts in market forces or other unforeseen events. As of 2020, when there would be approximately $6 million annually in net cash flow, there would still remain $245 million in unfunded capital projects. The model assumes that all available cash will fund capital projects until all capital projects are completed. As a result, the capital program would not completed for almost 40 years (i.e., not until approximately 2040), ten to 25 years later than under other alternatives.

Additionally, some commentors misinterpret the financial modeling information and conclude that the No Action Alternative (GMPA 2000) achieves financial self-sufficiency 10 years ahead of schedule. The congressional self-sufficiency mandate requires that the Trust generate

revenues exceeding annual operating expenses in 2013 and beyond. Because modeling of the No Action Alternative (GMPA 2000) shows projected expenses in 2013 to be $47.8 million and revenues generated in 2003 to be $67.4 million, some commentors believe the Trust will have achieved self-sufficiency 10 years ahead of schedule under this alternative. This is not the case. The 2003 revenue figure includes $22.5 million in appropriations and $11.5 million in revenues associated with Wherry Housing, which is scheduled for demolition. In actuality, in 2003, the "long-term revenue base" (revenues that do not terminate) would be only $33.4 million, well below the $47.8 million necessary to meet, much less exceed, expenses and achieve self-sufficiency. This "long-term revenue base" for the No Action Alternative (GMPA 2000) is not estimated to exceed the 2013 operating expense until 2012.

FI-24. ***Financial Feasibility of the Sierra Club Proposal***

The NRDC and the Sierra Club state that, based upon evaluating the Sierra Club proposal with a financial model, methods, and assumptions said to be similar to those used by the Trust, the Sierra Club's proposal is financially feasible and substantially better than the Trust's proposed Plan. The Sierra Club concludes that its proposal is financially viable, achieves self-sufficiency before 2013, completes the entire capital program seven years before the Draft Plan Alternative, and generates positive cash flow in 2005 (with a cumulative cash flow that exceeds what is projected for the Draft Plan by $100 million). The Sierra Club also reasons that revenues under its proposal would be approximately the same as under the Draft Plan because non-residential revenue reductions would be offset by increases in parking revenue, operating expenses would be substantially lower because of cost controls and reduced funding for programs, and capital expenses would be lower because of decreased funding for programs and a reduced rate of infrastructure improvements.

Response FI-24 – In response to this comment, the Trust (1) evaluated the Sierra Club's methodology and analysis of its proposal, and (2) evaluated the relative financial performance of the Sierra Club's proposal, now included in the EIS as the Final Plan Variant, using the PTMP financial model that was used to compare all other EIS alternatives. First, the Trust asked Sedway Group, the Trust's real estate consultants who developed and worked with the PTMP financial planning model throughout the PTMP planning process, to review the Sierra Club's financial analysis of its proposal, referred to by the Sierra Club as the "revised GMPA alternative." Sedway Group evaluated the methodology and financial assumptions used by the Sierra Club. Because not all details of the Sierra Club's 20-year cash flow analysis and financial assumptions were made explicit in the information submitted to the Trust, Sedway Group's evaluation is based only on the explicit information presented in the text and footnotes of the Sierra Club's proposal and analysis. The following text summarizes Sedway Group's evaluation:

Problems with Overall Methodology

The PTMP financial planning model was designed to compare, as accurately as possible, the hypothetical financial performance of different land use programs at the Presidio. In other words, the financial model was designed as an illustrative "planning" tool to test the comparative economic implications of different conceptual proposals for the Presidio. It was not designed to be used to predict financial outcomes with certainty or to predict with precision operating costs, capital costs, or revenues over a 20 to 30-year planning horizon. Thus, for the modeling results to be meaningful, it was important to keep certain key assumptions consistent across all planning alternatives. In this case, it appears that the Sierra Club has blended the financial results from several planning alternatives in an effort to present what it believes are the financial implications of its proposal.

The cash flow presented as the Sierra Club's "revised GMPA alternative" is really an amalgamation of assumptions from the Draft EIS version of the Draft Plan Alternative, the No Action Alternative (GMPA 2000), and the Sierra Club's own proposal (i.e., new assumption). Because it is an amalgamation, the financial analysis of the Sierra Club proposal cannot be compared to any one of the other PTMP alternatives in any meaningful way. To illustrate this point, Sedway Group has displayed the key line items in the Sierra Club proposal's financial analysis and the source of the assumption underlying those key line items in the table below:

Cash Flow Line Item	Source of Assumption
Revenues	
Non-Residential Building Revenues	Adapted from Draft Plan Alternative
Residential Building Revenues	Same as Draft Plan Alternative
Utilities/Telecom	Similar to No Action Alternative (GMPA 2000)
Parking Revenues	New Assumption
Capital Costs	
Non-Residential Building Capital Costs	Same as Draft Plan Alternative
Residential Building Capital Costs	Same as Draft Plan Alternative
Non-Building Capital Items (Infrastructure)	New Assumption
Program Capital Costs	New Assumption
Demolition Costs	
Non-Residential Demolition Costs	Same as No Action Alternative (GMPA 2000)
Baker Housing Demolition	Same as Draft Plan Alternative
Residential Demolition (Excluding Baker)	Same as Draft Plan Alternative
Parkwide Expenses	
Facilities, Legal, Planning, Real Estate	Updated From Fiscal Year 2002 Budget
Operations	New Assumption
Reserves, Events, Public Safety, Finance/Insurance	Same as No Action Alternative (GMPA 2000)
Programs	Same as No Action Alternative (GMPA 2000)
Parking (Transit)	New Assumption
Other Expenses	
Financing	Same as Draft Plan/No Action Alternative (GMPA 2000)
Residential Affordability Subsidy	Same as No Action Alternative (GMPA 2000)
Miscellaneous	Same as Draft Plan/No Action Alternative (GMPA 2000)

As the above table illustrates, an "apples-to-apples" comparison between the Sierra Club proposal and any single EIS alternative is problematic at best. By amalgamating assumptions and outcomes from several planning alternatives, the Sierra Club has developed a 20-year cash flow that cannot be compared meaningfully to the 20-year cash flows of any of the other planning alternatives.

Further, based on the details and assumptions the Sierra Club presented, the 20-year cash flow analysis does not accurately represent the land use plan and policies of the Sierra Club proposal. The most obvious example of this is stated in the Sierra Club's written text. The Sierra Club proposal states the intention to forego the Letterman Complex project, but it includes revenues from the LDAC project in the cash flow analysis. One cannot "pick and choose" either financial or land use numbers from different planning alternatives and declare that they accurately reflect a detailed alternative land use plan. In order to accurately represent the financial implications of the Sierra Club proposal, the proposal must be modeled in the same way (i.e., using the same methodology and consistently with) the other planning alternatives.

Also, the Sierra Club's 20-year cash flow ignores the issue of timing. In the financial planning model, explicit and consistent assumptions are made about the phasing and timing of capital investments. The model assumes capital investments are made based on the availability of cash, which in turn generates revenue to fund additional capital investments. Therefore, each PTMP planning alternative uses only the revenues available from its own unique land use program to fund further investments over time. In this sense, each alternative has its own unique estimated schedule for completing investments, depending on the rate at which revenues are generated. As such, the Sierra Club cannot assume or "borrow" the timing of revenue growth and the schedule of capital cost completion from other planning alternatives for use in its proposal. For example, it is unreasonable and inconsistent with the planning model's timing assumptions and methodology simply to assume that the Sierra Club proposal would generate 90 percent of the non-residential revenues of the Draft Plan Alternative.

Problems with Specific Assumptions: Revenues[13]

[13] The Sierra Club's proposal claims to generate $241.3 million more in total revenues over 20 years than the No Action Alternative (GMPA 2000), and claims to accomplish this with about 355,000 fewer square feet of building space.

Non-Residential Building Revenues: The Sierra Club calculates non-residential building revenues for its proposal by assuming 90 percent of the non-residential building revenues of the Draft Plan Alternative. This assumption was made because the Sierra Club's building square footage total (excluding "Residential," "Trust/NPS," and "Other" space but including LDAC) is approximately 90 percent of the Draft Plan Alternative's square footage total, given a roughly similar mix of uses.[14]

This assumption is not justified because the Sierra Club proposal, although similar to the Draft Plan Alternative in its overall mix of uses, does not include the same level of revenue-generating uses as the Draft Plan Alternative. For example:

1. *The Draft Plan Alternative includes revenues from the LDAC and the Sierra Club proposal calls for the elimination of LDAC.* The Sierra Club proposal assumes 90 percent of the Draft Plan Alternative's non-residential revenues, but those revenues include about $92 million (over 20 years) from the LDAC project. In its narrative, the Sierra Club states: "The Sierra Club plan calls for an end to negotiations with Lucas Films and abandoning the large private development in the park."[15] Thus, it does not seem reasonable for the Sierra Club to include LDAC revenues in the financial analysis of the Sierra Club proposal. In fact, including Service District Charges (SDC), the LDAC project was estimated in the Draft EIS to generate about $137 million over 20 years, which represents nearly 30 percent of all non-residential building revenues and SDC in the 20-year Draft Plan. Thus, the Sierra Club analysis is inappropriately including about 90 percent of the $92 million in non-residential building revenues and $45 million in SDC revenues generated over 20 years by the LDAC project.

2. *The Sierra Club Proposal emphasizes mission-enhancing tenants that may or may not be able to pay market rents.* The Sierra Club proposal emphasizes a different mix of tenants for the office space at the Presidio. The Sierra Club proposal calls for "all tenants to serve the mission of the Presidio national park, not private gain."[16] As described by the Sierra Club, these tenants should contribute to the vision of creating a global center dedicated to addressing the world's most critical environmental, social, and cultural challenges. Nevertheless, the Sierra Club proposal reserves only 25 percent of the total office space for non-profit tenants. It is assumed that the rest of the office space would generate market-rate office revenues. While some of these tenants may very well be able to pay market office rents (using their own funds or outside philanthropic sources), it seems unreasonable to assume that all of these tenants would be able to pay market rents, and thus the Sierra Club's financial model is inconsistent with the stated policy objective. Refer to Responses FI-4 and FI-18 for a discussion of market rents for non-profit space.

Residential Building Revenues: The Sierra Club financial model assumes the same amount of residential building revenues as is assumed for the Draft Plan Alternative. This assumption is made despite the fact that the Sierra Club proposal calls for less residential square footage and fewer units. Specifically, the Sierra Club plan calls for eliminating 489,000 square feet and 320 units.[17]

Under the Draft Plan Alternative, the average residential square foot generates about $260 a year and the average unit generates about $305,000 a year. Under the Sierra Club proposal, the average residential square foot generates about $347 a year (an increase of nearly 35 percent) and the average unit generates about $378,000 a year (an increase of nearly 25 percent). In its document, the Sierra Club fails to explain why residential units in its proposal

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[14] A more appropriate way to "scale" the revenue stream is to use a weighted average rent-per-square-foot figure. Sedway Group developed a detailed spreadsheet that calculated the weighted average rent-per-square-foot for all new and existing space (excluding LDAC) under the two scenarios. The result was that both figures were roughly similar. However, the Sierra Club's 90-percent assumption is flawed for other reasons, which are outlined later.

[15] Comments on the Presidio Draft PTIP/EIS, Executive Summary, page 2.

[16] Comments on the Presidio Draft PTIP/EIS, Executive Summary, page 1.

[17] Comments on the Presidio Draft PTIP/EIS, pages 5, 6, 14 and 18.

are generating so much more revenue than they are in the Draft Plan Alternative.

Parking Revenues: The parking revenue assumption in the Sierra Club proposal is new (i.e., developed by the Sierra Club) and does not appear in any of the other PTMP planning alternatives. According to the Sierra Club proposal financial projections, the Sierra Club's parking plan would generate $65 million for the Trust over 20 years. This money is generated by charging all employees who drive to the Presidio (excluding employees of LDAC) a fee of either $7 per day or $140 per month.[18] In the Sierra Club proposal financial model, this fee equates to between $3.0 million and $4.5 million a year between 2006 and 2020.

Even with a deduction of $40 million in "transit" expenses, the Sierra Club model still includes *about $25 million in pure profit* from the Presidio's overall parking/transit program. Charging such a high parking fee and accumulating such a large profit are unreasonable assumptions. The Trust is committed to parking management (including parking fees) as a strategy to reduce auto use; however, parking fees must be applied in a way that will not jeopardize the leasing of buildings.

Charging companies a parking fee as high as $7 per day would be a strong competitive disadvantage for the Presidio. Surface parking lots on the fringe of downtown San Francisco currently charge between $6 and $12 per day. The "market rate" for parking at the Presidio is less, given its more isolated location and relative lack of public transportation. High parking fees would likely deter many potential tenants from locating at the Presidio. In fact, rental rates would likely have to be reduced in the PTMP financial model if the Sierra Club's parking program were adopted, since the vast majority of tenants located outside San Francisco's central business district do not pay both market rents and parking fees. In addition, it is doubtful that the majority of non-profit tenants would be able to pay both market rents and $1,680 per year per employee to park at the Presidio, as is currently assumed in the Sierra Club financial model.

[18] Comments on the Presidio Draft PTIP/EIS, pages 29 and 46.

The assumption of parking revenues is not only suspect because of the "market rate" assumed, but also because the non-residential parking management is controversial, and will therefore have to be implemented in phases over time, resulting in far less in accumulated revenues than is assumed by the Sierra Club. Also, the assumption that revenues will exceed amounts required to fund parking, transit, and other transportation improvements as called for in the Final Plan is unrealistic. These issues are discussed further in the PTMP Financial Model Assumptions and Documentation binder (Tab 18) dated May 2002 and in responses to parking issues.

Problems with Specific Assumptions: Costs

Non-Residential Building Capital Costs: The Sierra Club assumes the same non-residential building capital costs as those assumed in the Draft Plan Alternative. In the Draft Plan Alternative, about 2.46 million square feet of existing non-residential space are assumed to be rehabilitated or converted to specific uses. In the Sierra Club proposal, about 2.31 million square feet are assumed to be rehabilitated, a difference of about 153,000 square feet. Thus, the non-residential building capital costs may be slightly overstated in the Sierra Club proposal 20-year cash flow.

The Sierra Club analysis also assumes that residential building capital costs are the same as they are in the Draft Plan Alternative despite very different scenarios of residential conversions. In the Draft Plan Alternative, about 1.53 million square feet of residential space are rehabilitated or converted to residential uses, whereas in the Sierra Club proposal, about 1.45 million square feet are rehabilitated or converted to residential uses, a difference of about 83,000 square feet. The real difference between the Club's proposal and the Trust's lies in the significantly higher number of residential conversions in the Sierra Club proposal than are assumed in the analysis of the Final Plan Alternative. Residential conversions are substantially more costly than standard residential rehabilitations. The Final Plan Alternative financial analysis assumes 360 residential units are created by either subdividing existing units or converting non-residential space into residential space. In the Sierra Club proposal, 500 residential units are created in this same manner. Thus, 140 more residential units are created by subdivision and/or conversion

in the Sierra Club proposal, equating to approximately $28 million in conversion costs. This additional cost is not accounted for in the Sierra Club proposal 20-year cash flow.

The Sierra Club's analysis of infrastructure costs is also flawed. The Club adapts non-building capital costs (infrastructure) in its proposal from the Draft Plan Alternative. In essence, the Sierra Club reduces these costs by about 20 percent to reflect the lower amount of square footage in the park under its proposal and spreads the costs over the first 25 years of the planning model, instead of the first 20 years of the planning model, as is assumed in the No Action Alternative (GMPA 2000).[19] By making these assumptions, the Sierra Club asserts that the 20-year cumulative cost can be reduced by about $22 million (or about $1.3 million a year).

The Sierra Club's assumption to adapt the Draft Plan Alternative infrastructure costs and use the adapted figure as a proxy for infrastructure costs for the Sierra Club proposal is not reasonable. Non-building capital items include the costs of developing the Presidio's open space, not just the costs of developing the Presidio's roads, telecommunications, and utilities (i.e., its urban infrastructure). In the PTMP financial model, the cost of developing the Presidio's urban infrastructure is the same across all planning alternatives, while the cost of developing the Presidio's open space varies across alternatives, depending on which currently-built areas are scheduled for natural space restoration. Thus, the Sierra Club is making a new assumption by stating that the cost of developing the Presidio's urban infrastructure varies by alternative.

Regardless of whether the Trust agrees with this assumption, the Sierra Club is not properly accounting for non-building capital costs outlined in its proposal, within the limits of the comparative model. The Club did not provide details of cost assumptions for its policies and land use plan for open space. The scope of open space enhancement seem at least similar to, and possibly greater than, the Final Plan Alternative, in which open space costs for natural areas total approximately $46 million under the model. The Trust estimated the capital costs associated with the open space policies suggested in the Sierra Club proposal despite the lack of detail from the Club concerning its assumption. This open space enhancement capital cost figure, estimated at $46 million, is incorporated in the financial analysis of the Final Plan Variant. The summary results of the evaluation of the Final Plan Variant are outlined in the "PTMP Financial Model Results" sub-section below.

The Sierra Club's assumption for program capital costs is also a new assumption, not found in any of the other PTMP planning alternatives. The Sierra Club model entirely eliminates the $10 million in program capital costs that are assumed in all the PTMP planning alternatives. This assumption seems unreasonable for the reasons articulated in Response FI-22.

Park-Wide Expenses: The footnote explaining park-wide expenses in the Sierra Club proposal 20-year cash flow states: "2002 parkwide expenses based on FY 2002 budget, FY 2003 estimate based on detailed analysis." However, this "detailed analysis" was not explained further.

The following discussion review assumptions regarding specific line items of park-wide expenses.

- *Facilities, Legal, Planning, Real Estate, Operations:* The expense totals for these line items are the same in the Draft Plan Alternative and the No Action Alternative (GMPA 2000). The Sierra Club's expense totals are significantly lower. In addition, the Sierra Club proposal incorporates parkwide-expense estimates from the Trust's Fiscal Year 2002 (FY 2002) budget with the exception of the Operations line item, and for that line item, the Sierra Club proposal shows a reduction from $11.5 million in FY 2002 to $8.4 million in FY 2003. This reduction was not explained in the footnotes or the text of the Sierra Club proposal, and appears to have little basis.

- *Reserves, Events, Public Safety, Finance/Insurance:* The expense totals for these line items are the same in the Draft Plan Alternative and the No Action Alternative (GMPA 2000), with the exception of releasing reserves. Releasing reserves are about $2.3 million lower in the No Action Alternative (GMPA 2000). The Sierra Club proposal expense totals assume the lower releasing reserves figure from the No Action

[19] Comments on the Presidio Draft PTIP/EIS, page 28.

Alternative (GMPA 2000). Again, no explanation is provided in the footnotes or the text.

- *Parking (Transit):* The Sierra Club proposal includes a new assumption about transit expenses. The Sierra Club's 20-year cash flow includes $40 million in transit expenses, which presumably support the Sierra Club's overall Transportation Demand Management (TDM) program. How this $40 million expense is derived is not explained. As noted earlier, the Sierra Club's assumption of $25 million in pure profit over 20 years (or $1.25 million a year) from the Presidio's overall parking/transit program is unsupported and seems implausible given the Presidio's relatively isolated location and its lack of public transportation, as well as other factors articulated above.

PTMP Financial Model Results

Due to the weaknesses of the Sierra Club's independent financial analysis, as outlined above, the Trust was unable to rely upon the Club's cash flow analysis. Instead, in order to provide an "apples-to-apples" comparison of the financial implications of the Sierra Club proposal and financial assumptions, the proposal was modeled using the PTMP financial model and modeling assumptions consistent with those of the other planning alternatives. Because the Sierra Club's land use program was most similar to the Final Plan Alternative (but without any new construction), the Sierra Club proposal has been named the Final Plan Variant. The details of the Sierra Club's land use program and key assumptions of the Final Plan Variant can be found in Volume I of the Final EIS, Section 2.6.

The Final Plan Variant was found to be financially self-sufficient and sustainable over the long term. The $614 million capital program is estimated to be completed in approximately 2035 and the implementation phase is estimated to be completed in approximately 2045. The capital program for the Final Plan Variant is the highest of all alternatives due primarily to the emphasis on converting space to small residential units, which accounts for more than 30 percent of the capital program. The Variant requires a longer period relative to other alternatives to complete the capital program and reach a stabilized financial state (i.e., only the No Action Alternative (GMPA 2000) period is longer). Also for comparison purposes, the implementation phase in the Final Plan Variant is roughly 15 years longer (i.e., extends to approximately year 2045) than the implementation phase in the Final Plan Alternative (i.e., extends to year 2029).

FINANCIAL SELF-SUFFICIENCY

FI-25. ***Progress Toward Self-Sufficiency***

Several commentors suggest that the financial model demonstrates that the Trust will readily and easily achieve self-sufficiency by 2013. One commentor states, "The local press has … labored under serious misunderstandings about the Presidio, especially concerning the Trust's finances. Many news stories have suggested that achieving self-sufficiency by 2013 will be a 'nearly impossible' task, but the spreadsheets in the Draft EIS project that this will be no problem at all! …. Why wouldn't the Trust proudly explain to the media that you're already very close to meeting the FY 2013 "self-sufficiency" target income?" In part, to support their claims, these commentors look to the Trust's budgets, which in 2001 showed $38 million in operating income (not including the lump sum payment from Lucasfilm) and more than $35 million from rental operations (e.g., rent, utility and telephone fees, and Service District Charges). Commentors also urged the Trust to pursue only those revisions to the 1994 GMPA needed to ensure the most fundamental level of self-sufficiency. One commentor states, "It has been well-established by various interested and involved citizens groups that the Presidio has enough potential revenue, based on present facilities, to make it self-sufficient and more by 2013, assuming the continuing refurbishing and rental of existing space. This should now be beyond debate." It is suggested that neither extensive new development nor significant increases in employment or housing are necessary for financial self-sufficiency.

Response FI-25 – It is not possible at this time to conclude that the Trust is "already very close to meeting the FY 2013 'self-sufficiency' target income." Several sources of revenue in the Fiscal Year 2001 and Fiscal Year 2002 budgets are temporary revenue sources (i.e., they are not revenue sources that will continue to be available to fund the revitalization of the Presidio over time). These temporary revenue sources include:

- Annual congressional appropriations (between $16 million and $23 million through 2012)
- Treasury borrowing ($21 million in 2001 and $15 million in 2002)
- Wherry Housing revenues ($11.5 million annually) and
- Miscellaneous revenues ($5.3 million in 2001 and $4.6 million in 2002)

In fact, revenue sources that will exist over the long term total only $23.6 million in 2001 and $27.2 million in 2002. To meet the self-sufficiency threshold, long-term revenues must exceed annual operating expenses in 2013 and every year thereafter. Using the conservative assumptions in the financial planning model, long-term revenue sources are not estimated to exceed expenses until at least 2008 under the Final Plan Alternative. This estimated outcome would only be accurate if all of the projected revenues, costs, and expenses actually came to pass exactly as assumed – an unlikely occurrence given the number of economic, timing, and other uncertainties associated with implementation.

Achieving financial self-sufficiency cannot be understood as merely covering annual operating expenses in 2013. The congressional self-sufficiency mandate requires that the Trust maintain stewardship of the park over the long term, and this includes ensuring the revenue-generation capacity to pay for the building and park-wide improvements (estimated at about a half a billion dollars) necessary to revitalize the Presidio. The Trust cannot fund these improvements, either at all or within a reasonable timeframe, if revenues just barely exceed operating expenses in 2013 (i.e., the most fundamental level of self-sufficiency). For example, if, in 2013, revenues exceed operating expenses by only one to two million dollars, there would be very few dollars available to fund park revitalization projects, which are estimated to remain 40 to 50 percent incomplete as of 2015. Furthermore, operating on such a slim margin would increase the risk that, in the event of major downturns in the market or other unforeseen events, the preservation, protection, and enhancement of park resources would be more difficult or unreasonably delayed. In other words, operating on too small a margin may place the park stewardship mandate in jeopardy.

In sum, the financial uncertainty and variability inherent in the 30-year model is not apparent in the financial spreadsheets and summary results presented for the PTMP alternatives, and reviewers have misinterpreted and used them for purposes for which they were not intended. The PTMP financial model reveals that there are many different land use plans with the capacity to meet the financial self-sufficiency mandate. The sensitivity analyses now presented in Appendix K of the Final EIS serve to demonstrate that changing even one financial or implementation variable can significantly alter the financial performance of an alternative. When multiple factors are varied simultaneously, the financial performance becomes even more uncertain. The Trust therefore believes it will best serve the Presidio's overall goals by not treating the financial mandate as "no problem at all."

In response to the comment that neither "extensive new development nor significant increases in…housing" may be needed for self-sufficiency, the Trust's Final Plan calls for neither. It reduces development park-wide, allows for no more than the currently existing number of housing units, and considers replacing some removed units with new ones in already developed areas of the park over the life of the Plan. These actions may indeed not be absolutely necessary to achieve self-sufficiency, but they may be desirable in order to achieve other resource protection and planning policy goals.

FI-26. ***Desired Level of Self-Sufficiency***

Several commentors urges the Trust to pursue only those revisions to the 1994 GMPA needed to ensure the most fundamental level of self-sufficiency. One commentor states, "It has been well-established by various interested and involved citizens groups that the Presidio has enough potential revenue, based on present facilities, to make it self-sufficient and more by 2013, assuming the continuing refurbishing and rental of existing space. This should now be beyond debate. It appears to us that you want to do more out of some notion of 'enhancing our lives'". Echoing this statement, another commentor states, "We don't want you to try to 'make a difference' in our lives, just preserve and enhance the Presidio as is." It is suggested that neither extensive new development nor significant increases in employment or housing are necessary for financial self-sufficiency.

Response FI-26 – The congressional mandate for the Presidio requires that the Trust pay for its operations and revitalization (i.e., capital investments) without ongoing federal appropriations. This mandate requires the Presidio to be financially self-sufficient in 2013 (i.e., annual revenues must exceed annual operating expenses). This mandate also requires the Presidio to generate sufficient revenues to fund the significant investment required to revitalize the park (e.g., investments in buildings, infrastructure, and open space). This concept has been defined by the Trust as "financial sustainability." Financial self-sufficiency in 2013 does not ensure financial sustainability, as described in Chapter Four of the Final Plan.

The financial planning model estimates that roughly 50 to 60 percent of the capital program in each PTMP alternative will be completed by 2013. Therefore, a substantial amount of capital improvements will still need to be completed after 2013 in each PTMP alternative. If the Trust met the financial self-sufficiency mandate in 2013 with only a slim operating margin, the financial sustainability of the park would be extremely vulnerable to major downturns in the market or unforeseen events that could have a negative impact on park finances. The Trust seeks a land use plan that can achieve both financial self-sufficiency and financial sustainability. Maintaining an extremely narrow margin of self-sufficiency could very possibly prevent the Trust from satisfying the self-sufficiency mandate over time due to the lack of capacity to generate sufficient revenues to fund the significant investments required to revitalize the park (e.g., investments in buildings, infrastructure, and open space). These investments are necessary if the Trust is to, as the commentor suggests, "just preserve and enhance the Presidio as is."

FI-27. ***Cost Controls***

Several commentors suggest that the Trust should reduce its capital costs and operating expenses (including program expenses) across the board in all of the PTIP planning alternatives. One commentor states, "[T]he plan's failure to control operating and capital costs is inconsistent with the financial mandate." Another commentor states that the Trust should analyze alternatives that propose financial solvency by significantly reducing yearly costs of infrastructure, buildings, administration, and development. Commentors also emphasize cost control measures. Because the Trust is governed by a self-sufficiency mandate, one commentor suggests that the Trust implement cost control measures that hold operating expenses to "the minimum necessary to operate and maintain the minimum level of buildings in the park … and should not exceed $48 million in 2003 and beyond."

Response FI-27 – In response to commentors who urge the Trust to reduce the annual operating expenses, the Trust has done exactly that and will continue to look for and implement ways to control costs in the future. The operating cost assumptions of the model were developed in Fiscal Year (FY) 2000 (when PTMP planning started) and were based on the Trust's approximately three years of actual operating experience. In its start-up years, the Trust's operating expenses were relatively high as the Trust moved aggressively to build an organization that could expedite preventative maintenance and tackle the backlog of the most pressing park improvements. In FY 2002, the Trust began a restructuring effort and has cut overall operating expenses in FY 2003 by 12.4 percent. The financial planning model does not incorporate these projected cuts, because they are still subject to the FY03 budgeting process, but does assume operating costs are reduced over time – specifically by 10 percent at each of three different junctures over 30 years.

As indicated in Chapter Four of the Final Plan, the Trust will look to a variety of techniques to monitor and control costs during Plan implementation, including value analysis and value-engineering techniques. For example, functional analysis and cost evaluation will be applied to achieve the lowest cost, one that is consistent with required environmental and energy performance, reliability, quality, safety, and resource protection. Also, construction and operational cost estimates will be reviewed throughout the planning and development processes to avoid excessive, unwarranted, or unnecessary costs. Further, many activities will be outsourced, and competitive bidding will ensure some level of cost control. Thus, in practice, the Trust has embraced commentors' suggestions to control and reduce park operating expenses, and will continue to do so during Plan implementation.

FI-28. ***Contribution of Letterman Digital Arts Center (LDAC) to Self-Sufficiency***

Several commentors suggest that the development of the 23-acre Letterman site is financially unnecessary because the ground rent is not needed for financial self-sufficiency. States one commentor, "The Trust should abandon the project and pay whatever contractual penalties may be required because these penalties will be offset by the environmental benefits of abandoning the project. Penalties would also be offset by 'savings in infrastructure costs budgeted during construction and in the future.'" Several commentors suggest that self-sufficiency could still be achieved without LDAC revenues if parkwide revenues were increased, operating expenses were reduced, and program expenses were reduced. States one commentor, "The project is not needed for self-sufficiency, given astute, thoughtful and minimalist management of the Presidio." Some suggest simply increasing non-residential rental revenue to make up for the lost LDAC revenues (assuming the Trust bought its way out of the contractual agreement with Lucasfilm).

Response FI-28 – Commentors misunderstand the status of the LDAC project. It has been the subject of its own planning process and environmental impact statement. The former buildings on the site have been removed, and construction will begin shortly. Refer to Responses EP-16 through EP-20. Also, the most important reason for pursuing and finalizing project proponent selection and moving forward with implementation of the project shortly after formation of the Trust was the Project's substantial contribution to the Trust's financial self-sufficiency.

The commentors are mistaken that the LDAC revenues are unnecessary for the park's financial viability. In response to comments, and to test the assertion in the context of the proposed PTMP alternatives, the Trust undertook a sensitivity analysis that eliminated revenues and costs associated with the LDAC project from the model's assumptions for the Final Plan Alternative, the Final Plan Variant (which incorporates the Sierra Club) and the No Action Alternative (GMPA 2000). The LDAC agreement will generate substantial revenue for the Trust (about $8.7 million a year or about $215 million over 30 years). Eliminating these revenues (and the costs associated with the development) would have a significant negative impact on the financial performance of all three alternatives.[20]

Under this scenario, the Final Plan Alternative would perform at marginal self-sufficiency between 2015 and 2029. In 2013, the operating margin (total revenues less total operating expenses) would be only $3.1 million, and $215 million or only about 37 percent of capital projects would have been completed. The time required to complete the capital program would be extended considerably, from 2025 to approximately 2055. The time required to fully fund reserves would also be extended considerably, from 2029 to between 2070 and 2075. Finally, during the years in which the park is projected to be operating on a slim margin (i.e., between 2015 and 2029), the financial viability of this alternative would be highly vulnerable to significant downturns in the economy or other negative forces beyond the control of the Trust. Thus, without the LDAC revenues, the Final Plan Alternative would be only marginally self-sufficient and would not be financially sustainable over the long term. In 2013, the operating margin (total revenues less total operating expenses) is only $3.1 million, and the alternative performs at a slim operating margin for almost 15 years (between 2015 and 2029). Only about a third of the park's capital improvements are completed. The time required to complete these improvements is extended by 30 years (from 2025 to 2055) and stabilized financial state is not reached until between 2070 and 2075.

Under the same scenario, neither the Final Plan Variant nor the No Action Alternative (GMPA 2000) would be financially self-sufficient or sustainable. Eliminating about $8.7 million per year or $215 million over 30 years (and the associated costs of development) would have a significant negative impact on the Final Plan Variant. Without the LDAC revenues, the Final Plan Variant would not reach self-sufficiency by 2013: operating expenses would exceed revenues by $3.3 million that year. Similarly, without the LDAC revenues, the No Action Alternative (GMPA 2000) would not reach self-sufficiency by 2013 because operating expenses would exceed revenues by $14 million in

[20] The financial impact on the other PTMP land use alternatives would be equally significant.

2013, and the alternative would not be financially sustainable over the long term.

Overall, results of this sensitivity analysis suggest that the revenues associated with the LDAC are critical to the Trust's ability to achieve financial self-sufficiency and financial sustainability, as mandated by the U.S. Congress.

MISCELLANEOUS FINANCIAL COMMENTS

FI-29. ***Philanthropic Contributions in the PTMP Financial Analysis***

Several commentors suggest that the Trust should include in its financial analysis the potential for philanthropic contributions, such as those from other government agencies, volunteer organizations, and non-profit partners. These contributions, the commentors suggest, could supplement revenues and reduce the need for revenue generation from "new development." States one commentor, "Financial and management strategies examined should have been based more broadly on a range of creative but realistic funding concepts and sources than simply on exclusive reliance on funding from the market valuation of the Presidio's existing real estate assets." Specific projects cited as potential recipients of philanthropic support include the Fort Scott Institute (an estimated $35 million in rehabilitation costs), general building rehabilitation for programs related to the GMPA vision (estimated at $50 million), the Montgomery Street barracks rehabilitation (estimated at $10 million per building), the Crissy Marsh expansion, and the Tennessee Hollow restoration (estimated at $20 million).

Response FI-29 – For the same reasons that the Trust declined to include philanthropic contributions in the financial planning model in response to scoping comments, it is again declining to change this financial planning modeling assumption. The financial model and its assumptions are guided by the principle of conservatism. Basing the alternatives' financial performance on the assumed receipt of donations, when there is no actual commitment of funds, is inconsistent with the model's principle of conservatism.

The Trust has not yet developed a philanthropic strategy, but is committed to doing so in the future to implement important policy goals of its Plan. It is therefore too early to make reasonable assumptions about philanthropic revenues and include them in the financial planning model. Refer also to Response PR-21.

The continued suggestion to include philanthropic revenues in the financial modeling of PTMP alternatives indicates a misunderstanding of the PTMP financial model. The model was designed for comparative purposes. Its assumptions, as long as they are reasonable and consistently applied, allow a meaningful comparison among different planning alternatives. Its revenue assumptions are not meant to indicate future revenue targets, budgets, or financial policies. This is equally true for philanthropy revenues. Philanthropy will be sought as part of Plan implementation, as indicated in the Final Plan. Omitting philanthropy revenues from the model in no way affects the comparison of alternatives.

FI-30. ***Format of Financial Results in the Final EIS***

A few commentors suggest that the Trust adopt a different format to present the financial results in the Final EIS. Specifically, they suggest that the Trust's annual operating budget be presented separately from non-operating revenues and separately from the capital improvement project budget. States one commentor, "I believe this would make your financial projections far more understandable for the public."

Response FI-30 – The Trust sees no need to alter the presentation format of the financial results. The financial results presented in the Draft EIS and the Final EIS do in fact separate the Trust's annual operating budget from non-operating revenues (such as appropriations and borrowing) and capital improvements. The detailed cash flow spreadsheets for each PTMP planning alternative show line items for park-wide expenses (i.e., facilities, legal, planning, real estate, operations, releasing reserves, special events, public safety, finance and insurance, programs, and parking); separate line items for non-operating revenues (i.e., appropriations and borrowing); and further line items for capital improvements (i.e., non-residential building capital costs, residential building capital costs, non-building capital items, program capital costs, non-residential demolition costs, Wherry Housing demolition, and other residential demolition). Results of the financial analysis are summarized in Volume III of the Final EIS, Appendix K (Financial Analysis), and in Volume I of the Final EIS, Section 2.0 (Alternatives).

FI-31. ***Cost of Tennessee Hollow Restoration and Crissy Marsh Expansion***

A few commentors suggest that the Tennessee Hollow restoration was significantly under-funded in the Draft Plan Alternative. One commentor suggests that the Trust fund, with its receipts, the expansion of Crissy Marsh.

Response FI-31 – Refer to Response FI-9. In the Draft Plan alternative, as well as in the other PTIP planning alternatives that call for the restoration of Tennessee Hollow, the Trust allocated approximately $806,000. As noted, in actuality, capital costs may be higher or lower than what is assumed in the financial planning model. This is because the assumptions were based upon the best available information. It is also particularly difficult to forecast capital costs accurately when the scope of the capital improvement (or in this case, natural resource enhancement) is uncertain. Additional planning for both the Tennessee Hollow restoration and the Crissy Marsh study is just beginning; cost elements of both projects will, of necessity, be refined. As the commentors suggest, associated costs may ultimately be quite a bit higher than assumed for PTMP financial modeling purposes.

Where the model, as here, is used only to compare the relative financial performance of alternative land use scenarios rather than to accurately predict long-term costs, estimates that may be high (such as the infrastructure capital costs discussed in Response FI-9) are likely to be offset by others that may be low, such as the Tennessee Hollow cost noted by the commentor.

FI-32. ***Rate of Housing Removal***

Several commentors encourage the Trust to remove housing as quickly as financially possible. ("Housing areas proposed for removal should be phased out as soon as financially possible to allow for parkland restoration.")

Response FI-32 – The PTMP financial model makes assumptions about the phased demolition of Wherry Housing and other non-historic housing units, but these assumptions are not intended to be indicators of actual implementation decisions. The timing of residential demolition will hinge on future long-term implementation decisions. The Trust will consider factors such as the cost of building demolition as determined by more refined cost estimates, the need for revenues to fund natural resource and preservation goals, and issues related to the feasibility of habitat restoration, among other things. See responses to housing comments for further discussion.

FI-33. ***Public Safety Cost Estimates***

Some commentors voice concern about the Trust's estimate of annual public safety costs (about $6.0 million). Instead, some commentors suggest that the Trust use historical U.S. Park Police (USPP) figures, which estimate the annual cost required to maintain the USPP's current level of service. One commentor states, "Specifically for the GMPA 2000 Alternative, the USPP identifies start-up costs for hiring additional personnel, (and) purchasing new vehicles and other equipment of $725,000. In addition, the annual costs for staffing, recruitment, equipment, and supplies are estimated to be as much as $2.6 million. We believe that such an analysis for the other alternatives would be instructive to the financial model." In addition, some commentors suggest that the Trust encourage the fire department to identify its costs to deliver service under the various planning alternatives, since "changes in population are important life-safety factors, and operations will undoubtedly have to be adjusted to maintain current levels of service."

Response FI-33 – The PTMP financial model assumes that expenses for public safety services would total $6 million per year. This dollar figure is based upon existing agreements with the USPP and the NPS for law enforcement, fire prevention and suppression, and emergency medical response services. As indicated in many of the preceding responses to comments, commentors' suggestions misunderstood the purpose of the PTMP financial model. Though the Trust made diligent efforts to include a reasonable estimate of future public safety costs, a precise estimate is not material to the application or outcome of a financial model used to compare the relative, long-term financial performance of different planning alternatives. See Response FI-1. Most costs are treated as constants in the model in an effort to simplify the calculations and make the comparison among alternatives meaningful. In this light, attempting to accurately predict or vary future estimates of public safety cost by alternative, as the comments suggest, is unnecessary, and complicates the model in a way that does not serve its broad purposes. See also Response FI-8.

FI-34. ***Parking Fees and TDM Expenses in the PTMP Financial Analysis***

Several commentors suggest that the Trust charge user fees to increase revenues, including monthly parking fees for employees (suggested at $140 per month or $7 per day) and fees for people who drive long distances to work at or visit the Presidio. One commentor states, "...anyone that needs to drive, needs to pay. All residents living in a mile radius outside of the Presidio, should have free access to the Presidio, as should residents of the Presidio housing." Commentors do not support the idea of charging entrance fees at the gates of the Presidio. Commentors also suggest that the Trust quantify forecasted parking revenues and the expenses associated with its Transportation Demand Management (TDM) program, rather than assuming in the financial analysis that parking revenues would be offset by expenses associated with the TDM program (i.e., the sum of these two programs would equal zero). One commentor states, "While the Draft Plan makes a case that actual TDM revenues and expenses are uncertain, so are many of the Presidio's other revenues. A best estimate of revenues should be made and reported."

Response FI-34 – The suggestions raised by commentors again confuse transportation-related policy decisions with the purposes and application of the financial planning model. See Response FI-1. For purposes of comparing hypothetical planning alternatives, the Trust has reasonably assumed that parking fee revenues will be fully offset by TDM program costs. The basis for this financial modeling assumption is fully set forth in the (updated) PTMP Financial Model Assumptions and Documentation binder dated May 2002 available in the Trust offices. At this time, both the potential revenues from parking fees and the costs associated with TDM and other transportation programs are highly uncertain. The Trust chose not to complicate the model with a series of guesses about highly uncertain and speculative future parking revenues and TDM costs.

With respect to the policy decision, the Trust is planning to implement parking fees for Presidio employees and residents as a means to control parking demand. See Response PK-14. In response to the comment suggesting specific parking fees, see Response FI-24.

FI-35. ***Mitigation Costs, Transit Costs, and Other Costs in the PTMP Financial Analysis***

Some commentors suggest that the Trust include in its financial analysis the estimated cost of mitigating any neighborhood traffic impacts associated with the different PTMP planning alternatives. These mitigation measures might include enhanced bus service and other transit improvements outside the Presidio boundaries. One commentor states, "We would like to see a financial plan that reflects these differential costs, and shows whether or not each alternative can generate a revenue stream sufficient to offset the cost of implementing mitigation strategies, such as increased transit service." Commentors also want to know what specific transit improvements are being contemplated by the Trust, and how these improvements might be funded.

Response FI-35 – Costs of many of the proposed mitigation measures are already encompassed within the operating and capital cost assumptions of the PTMP financial model. Because of the length of the planning horizon and the uncertainty over the extent of mitigation that may be needed in the long term, many of these costs were included in general terms as part of a larger cost category or as rough estimates. Other costs are too distant or too speculative to provide a meaningful guess in the context of a comparative 30-year model. Further, the uncertainty of making accurate predictions of how mitigation costs may vary from one alternative to another is an effort outside the bounds of the usefulness and purpose of the PTMP financial model. See Response FI-8. Rather than attempting to use the model to estimate long-term transportation mitigation costs precisely, the modeling assumptions give an adequate preliminary estimate of mitigation costs for purposes of comparing alternatives and indicating whether an alternative has adequate revenue-generating capacity to achieve baseline self-sufficiency and sustainability. In the future, the Trust must balance the complex mix of financial variables – changes in the level and sources of revenue, timing of cash flow, market conditions, and cost control measures – so that funds are available for those mitigation measures, such as transit and transportation enhancements to protect the environmental conditions and character of the park. During Plan implementation, the Trust will rely upon more sophisticated financial budgeting tools in setting budget priorities and allocating sufficient funds to

needed implementation activities, including sufficient funds for needed mitigation measures.

FI-36. ***City and County of San Francisco Tax Revenues in the PTMP Financial Analysis***

Several commentors suggest that the Trust estimate the fiscal impact of the PTMP planning alternatives on the CCSF in terms of lost tax revenues. Lost tax revenues might occur, commentors suggest, if businesses choose to locate at the Presidio instead of within the borders of the CCSF. One commentor states, "Some of these businesses will compete directly with established businesses outside the Presidio gates, but are not subject to the same local and state taxes. For example, lodging, restaurants, and retail businesses will compete with nearby businesses on Lombard Street and the surrounding area. Is the Trust expecting to create a tax-free business zone?" This sentiment is echoed by another commentor: "How do you justify not collecting taxes in the park at the expense of the neighboring businesses that will be taxed? What is the Trust's justification for financially trying to ruin the small businesses adjacent to the National Park?"

Response FI-36 – None of the PTIP planning will have a significant negative effect on tax revenue to the CCSF. Businesses locating within the Presidio are not exempt from most business taxes, and such taxes do not accrue to the Trust, but to the CCSF. Sales tax revenues and hotel occupancy taxes are two examples of taxes that would accrue to the CCSF. CCSF is restricted from collecting property taxes and assessments related to the Presidio, however, because the Presidio has always been under exclusive federal jurisdiction and has never generated property tax revenue for CCSF. Therefore, no stream of property tax revenues exists that would be affected by future activities under the Plan. As to commentors' concerns that Presidio-based businesses might enjoy a competitive advantage, it is important to note that in addition to rent, Presidio tenants are required to pay a service district charge to the Trust that is similar in many respects to property tax. The revenue from the service district charge supports the various municipal-type services that the Trust, rather than the CCSF, provides to Area B of the Presidio.

Costs to CCSF related to the Presidio are also extremely limited. The Trust and the NPS, not CCSF, bear the cost of repair, maintenance and capital improvements for the Presidio's roads, sidewalks, sewer, storm drainage systems, and forest and other open space. The Presidio has its own water source and water treatment plant. The U.S. Park Police provide law enforcement services at the Presidio and the NPS provides fire and emergency response. To the extent students living in the Presidio attend San Francisco public schools (supported primarily by local property taxes), federal law provides for a per-student payment from the Department of Education to the school district.

In the few cases where the Trust uses CCSF services (e.g., treatment of sanitary sewer, supplemental potable water), the Trust pays for those services. In some cases, Presidio municipal services even provide a benefit to CCSF residents. For example, after the 1989 earthquake the Presidio Fire Department provided one of the first emergency service response teams to the Marina area.

Finally, the commentors' statements appear to ignore the many extraordinary tangible benefits provided by the Presidio to the residents and economy of San Francisco. Residents and visitors have access to and enjoy the Presidio's recreational, natural and historic resources at no charge, and the CCSF is not required to fund even a portion of the park's maintenance and upkeep.

4.31 CUMULATIVE IMPACTS (CI)

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CI-1. *General Comments on Cumulative Analysis*

Several commentors provide general comments on cumulative impacts in the Draft EIS. The comments range from general questions about the analysis to criticisms of the basis and methodology used to predict cumulative effects.

Response CI-1 – In response to the comments raised, the Trust performed a thorough review of Section 4.8 (Cumulative Impacts) of the Draft EIS, and revised several sub-sections on cumulative impacts. As a background, the discussion of cumulative impacts is organized by environmental resource topic. Table 62, which provides the context for the discussion, enumerates past, present and reasonably foreseeable actions, including projects by other agencies (NPS, USFWS, and the CCSF Planning Department), that were specifically considered in the analysis (in addition to background growth). The identified actions were chosen based on their proximity to the Presidio, their potential influence on the same resources that could be affected by implementation of the PTMP (i.e., whether the effects of these actions would be similar to those of the project), and the likelihood of their occurrence. The actions were identified by consulting with various agencies within a project impact zone (which varies for each resource) and investigating their actions in the planning, budgeting, or execution phase. The level of analysis and scope of cumulative impact assessment within each of the resource areas in the Final EIS is commensurate with the potential impacts, i.e., a greater degree of detail is provided for more potentially serious impacts. In some cases, cumulative effects were also compared to appropriate national, state, regional, or community goals to determine whether the total effect would be significant. In all but one resource area, the analysis in the Final EIS determined that cumulative impacts would not be significant and that the resources of concern would not be degraded to unacceptable levels. Cumulative air quality issues were found to be potentially significant because of contributions to regional growth (i.e., not because of localized air quality impacts).

General issues raised by commentors, and responses are provided below.

- *Golden Gate Bridge Seismic Retrofit Project:* The GGBHTD states that the Golden Gate Bridge Seismic Retrofit Project will be ongoing and that this project should be recognized in the EIS.

  Response – In response to this comment, the project was incorporated into Table 62 (cumulative context) of the EIS and considered in the assessment of cumulative traffic.

- *Biological and Water Resources:* The NRDC indicates that a number of the analyses appeared "excessively conclusory" and in particular referenced the discussion of biological and water resources.

  Response – This section was refined in response to this comment, and additional clarity regarding cumulative impact conclusion statements provided. In particular, the NRDC stated that the Draft EIS concludes "… 'programs and projects could contribute cumulatively to biological impacts at the Presidio," whereas it states that impacts to water resources "are not expected to be adverse" because "the Trust would strive to maintain 'no loss' of wetland features and adopt and enforce strict regulatory mechanisms…" Each of these specific comments is addressed below.

  The reference to "programs and projects" contributing cumulatively to biological resource impacts at the Presidio is just one sentence in the analysis. The Trust concurs that, if read alone, this statement would appear to be "conclusory." However, that sentence is directly supported with specific information on each of the programs and projects referenced, including current status, agency responsible for implementation, and a characterization of their relative effects on biological resources. Specifically, the analysis calls out whether the impact of each program and project would be beneficial or adverse (or potentially both), identifies the resources affected (i.e., dune habitat, San Francisco lessingia, etc.), and characterizes, based on the best available information, the magnitude and intensity of such effects. This

information is used to provide the basis for the conclusion of potential cumulative effects. Identified effects would be mitigated by implementation of measures identified in the Natural Resources section of the EIS.

With regard to the specific statements taken from the water resources section, these were the first two sentences of the analysis and were intended to serve as an introduction. The Trust concurs again that, if read alone, these statements appear to have been made without supporting evidence. In response to this comment, these conclusion statements were moved from the introductory paragraph, and were refined and placed more appropriately after the supporting analyses upon which they are based.

- *Historic Resources*: The NRDC and one individual specifically comment on the historic analysis, stating that the lack of plan specificity has precluded a thorough analysis of cumulative impacts on the NHLD.

  Response – The Final Plan and EIS have been modified in response to this comment. Chapter One of the Plan now contains a firm commitment to protecting and preserving the overall integrity and status of the NHLD, one of the principal issues with regard to potential cumulative effects. Chapter Three of the Final Plan now includes, for each planning district, additional information including the existing total building area, maximum permitted building area, maximum demolition, and maximum new construction in addition to land use preferences. Chapter Three also includes a set of planning guidelines for each district that would form the basis for future implementation activities. The assessment of cultural resources impacts in the Final EIS has been expanded to include a summary of related actions in each planning district for each alternative and to clarify which alternatives would affect the integrity of the NHLD, and which would not. Because specifics about building demolition and new construction beyond what is presented in the Final Plan are not known, the Plan commits to quantitative and qualitative standards and a process for public involvement as well as for historic compliance consultation to minimize potential effects. Also see Responses HR-1 and HR-22. This approach does not preclude the analysis and conclusions now presented with regard to cumulative effects in Section 4.8.1.

- *Foreseeable Actions:* The CCSF Planning Department states that while preparation of a programmatic environmental document is appropriate, the cumulative analysis is incomplete and should acknowledge buildout of Area A, the Letterman Complex, and all other subareas within the Presidio.

  Response – The EIS analysis does, in fact, consider the referenced projects/actions. For example, the traffic analysis, and air quality and noise analyses, include consideration of Area A land uses and assumptions related to the Doyle Drive project, the Letterman Complex (including the LDAC project), and buildout of all of the planning districts at the park. The analysis also incorporats information provided by the San Francisco County Transportation Authority on regional travel demand. For additional discussion of the assumptions used in developing the transportation methodology, please refer to the responses to Transportation and Circulation comments.

- *Cumulative Impacts on Adjacent Neighborhoods:* Several commentors echo similar comments, with a focus on adjacent neighborhoods and the city as a whole.

  Response – As described in Chapter 4 (both project-specific and cumulative analyses) of the Final EIS, consideration of impacts on adjacent neighborhoods and the city are discussed. Examples of analyses that address effects on adjacent neighborhoods and/or the City include the Noise, Water Supply, Wastewater Treatment and Disposal, and Transportation sections.

- *Cumulative Air Quality and Noise Impacts:* The Cow Hollow Neighbors in Action (CHNA) asks specific questions related to air quality and noise effects and the assumptions used in preparing the cumulative impact methodology.

  Response – These issues are addressed in the responses to air quality and noise comments, as well as in Section 4.8 of the EIS. Because noise and air quality are largely traffic-generated the analysis of these issues was based on future travel forecasts that combined traffic associated with the project with existing traffic and projected increases in traffic due to other sources.

- *Mitigation of Cumulative Effects:* The CHNA also asks how cumulative effects would be mitigated.

  Response – Mitigation measures presented in Chapter 4 of the EIS would address the contribution of the EIS alternatives to the potential cumulative impacts identified. The mitigation presented in the EIS includes relevant measures taken from the GMPA, as well as new measures developed and refined in response to public comments to avoid or minimize to the greatest extent practicable the impacts associated with reuse of the Presidio as a national park. Other programs and projects identified in Table 62 may likewise include mitigation to address their contribution to potential cumulative effects. These are beyond the scope of the current analysis.

- *Special Events:* The CHNA questions the validity and accuracy of a "reply" made by the Trust to "coordinate events."

  Response – The apparent context of this comment relates to special events, and the CHNA states that the Presidio Trust has "made this promise since 1994 but has not kept (this) promise." The Presidio Trust was established by the U.S. Congress in 1996, and did not assume administrative jurisdiction over Area B of the Presidio until 1998. Therefore the Trust can only respond to activities occurring within this timeframe. After assuming responsibility for Area B, the Trust established a Special Events department to review and permit special event activities to ensure that park resources are protected and events are adequately coordinated. Weekly coordination meetings with the NPS, Trust, U.S. Park Police, and Presidio Fire Department are held to track and discuss upcoming events. Events are reviewed, and are subject to environmental review as needed, on a case-by-case basis. Communication with additional agencies and groups, including the San Francisco Department of Parking and Traffic, is also completed, as needed, to ensure that adequate coordination is provided. Several mitigation measures presented in the EIS reiterate this process, and establish new requirements including a measure that specifically relates to special event parking management. Refer to Mitigation Measure TR-24 in the Final EIS.

CI-2. ***Cumulative Effects of Increased Visitation***

The NRDC expresses concern related to increased visitation and states that the cumulative impact of this increase on the park's resources has been ignored in the EIS. They ask that the EIS address the impact of more than doubling the "GMPA level" of visitors. The NRDC also makes comparisons with other parks and states that the Draft Plan "...would make Area B one of the top attractions....among all national state parks and amusement/theme parks in the State."

Response CI-2 – Section 4.8 (Cumulative Effects) has been reviewed and refined in response to this and other comments related to the cumulative analyses. As a point of clarification, the GMPA Final EIS projected a 2010 annual visitation level of 8.4 million visitors (pages 18 and 162). This level of visitation is substantially higher than projected for the No Action Alternative (GMPA 2000) evaluated in the PTIP Draft EIS, which used a revised methodology to project 3.7 million visitors for Area B. An explanation of the methodology used to predict future visitation and adjustments made in response to public comments has been incorporated into the Final EIS. For additional information, including an overview of the differences in methodology used in the GMPA Final EIS and this document, refer to the Response VE-1.

The Trust strongly disagrees with the NRDC's assertion that the cumulative impacts of increased visitation on park resources have been ignored in the EIS. The commentor is referred to, for example, Sections 4.5 (Transportation and Circulation), 4.3.4 (Air Quality), and 4.3.5 (Noise), which evaluate the effects of full reuse of the Presidio as a national park, including trips and visitation associated with Area A. Similarly, Section 4.3.1 (Biological Resources) evaluates and incorporates consideration of the relative visitor "use levels" for each of the alternatives on biological resources and identifies mitigation measures to preserve and protect park resources. For each of these resource topics, activities within Area A are also factored into the project-specific analyses, as appropriate, to ensure that a comprehensive assessment of the environmental consequences is provided. Implementation of suggested mitigation measures would limit visitor opportunities to those that are suited and appropriate to the park, and would prohibit visitor uses that would degrade the park's resources or values. Management controls on visitor uses would be imposed to ensure that the Presidio's resources are protected.

Restrictions would be based on professional judgment, law and policy, the best available scientific study or research, appropriate environmental review, and other available data. As visitor use changes over time, the Trust would decide if additional management actions are needed to keep use at acceptable and sustainable levels. Visitor carrying capacities for managing visitor use would be identified if necessary.

Regarding comparisons with other parks, the Trust reviewed California state park data referenced by the NRDC. According to the information provided, existing Presidio visitation would also place the park among the top attractions in the state. The comparison with other state attractions appears to be made to reinforce the NRDC's statement regarding the need to evaluate the impact of increased visitation. As discussed above, the impacts of this increase in visitation are described in the Transportation and Circulation, Air Quality, Noise, and Biological Resources sections of the EIS. With regard to comparison with current visitation, the Draft (and Final) EIS provide information obtained from the NPS visitor database. As discussed in Section 3.4.4 of the EIS, NPS data indicate that visitation within the GGNRA (including Muir Woods National Monument, Fort Point, and the San Francisco Maritime Museum) was approximately 20.5 million in 2000 (NPS Visitation Database, www.nps.gov.)

Based on the analysis provided in the EIS, expanded facilities and programming under the PTMP would complement the visitor experience offered by the NPS's Presidio operations, the rest of the GGNRA, and other regional visitor resources. Cumulative regional development by NPS at the Presidio, the rest of the GGNRA, and other regional visitor resources would contribute to regional and national efforts to expand interpretive and educational opportunities for the public. Additional educational resources would be available to Bay Area residents and visitors. The analysis concludes that no adverse cumulative impacts on visitor facilities are anticipated for any of the alternatives. As discussed in Section 4.4.4, the Trust would implement project-specific mitigation measures to ensure that future visitation does not adversely affect the Presidio's resources or the public's enjoyment of the park.

CI-3. ***Cumulative Analysis of Wastewater Effects***

The NRDC criticizes the approach used in both the project-specific and cumulative analysis of wastewater treatment and disposal impacts. In particular, the NRDC references the lack of quantification and discussion of the CCSF's combined sewer overflows and corresponding contribution by the Presidio to such events.

Response CI-3 – In response to this comment, Sections 4.6.2 and 4.8.5 (project-specific and cumulative impacts) of the EIS were revised to specifically quantify the projected impact of the various alternatives on the CCSF's combined sewer system which would be de minimus. Additional discussion of combined sewer overflows was also incorporated into the EIS. Please refer to the responses to utilities (UT) comments for more information on these issues.

4.32 TENANT SELECTION (TS)

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TYPE OF TENANTS

TS-1. *Mission-Related Tenants*

Many commentors, including various environmental organizations and neighborhood associations, believe that the Trust should seek tenants who have a mission or business purpose related to park themes. They assert that the PTIP represents a substantial shift from the GMPA in the relative emphasis on financial versus program support as part of the tenant selection process. They ask that tenant selection emphasize the importance of visitor and educational program contributions found in the proposed tenant selection criteria of the GMPA, and that no premium be placed on financial considerations. ("The Draft PTIP should not put contributions to the visitor's national park experience on par with financial contributions.") They are concerned that if tenants' primary contributions are revenue generation, program provision by such tenants might be very limited. ("The idea of making the Presidio's resources available primarily to the 'highest bidder' could well jeopardize the unique mix of non-profit and other uses that are so successful and vital in the Presidio and Fort Mason."). The Sierra Club states "all remaining buildings should be leased to narrowly defined GMPA mission-related tenants."

Response TS-1 – The Trust Act, which was passed after the GMPA became final in 1994, altered the tenant selection landscape significantly by elevating the importance of financial considerations above their role in the GMPA. The Trust Act (Section 104(n)) provides as follows: "In managing and leasing the properties transferred to it, the Trust shall consider the extent to which prospective tenants contribute to the implementation of the general objectives of the General Management Plan for the Presidio and to the reduction of cost to the Federal Government. The Trust shall give priority to the following categories of tenants: Tenants that enhance the financial viability of the Presidio and tenants that facilitate the cost-effective preservation of historic buildings through their reuse of such buildings." To the extent commentors see a shift in the tenant selection approach, it is in large part due to the requirements of the Trust's enabling statute. These statutory changes allow the Trust to consider a prospective tenant's program contribution, but require that the Trust consider finances in tenant selection. These new requirements do not mean the Trust must select the "highest bidder," and the Trust is not proposing such an approach in the PTMP. These requirements do mean that the Trust cannot limit itself to consideration of only a prospective tenant's programmatic contribution.

Were the Trust to follow the suggestion of one commentor to accept "only public purpose tenants who are committed to the widest possible public access," the Trust would also have to find within this group the smaller sub-group that would "enhance the financial viability of the Presidio" and/or "facilitate the cost-effective preservation of historic buildings…."

The tenant selection criteria and related discussion in Chapter Four of the Final Plan ensure that multiple criteria will be considered by the Trust. These criteria include financial viability and responsiveness to the general objectives of the GMPA. Also see Response TS-6, below.

TS-2. ***Other Types of Tenants are not Enough***

Several commentors are not convinced by statements in the PTIP offering reasons for diverging from the GMPA's tenant selection criteria. They feel that the PTIP "inappropriately opens the doors of the park's non-residential buildings… with no justification, and with no evidence that the 1994 GMPA's universe of potential tenants would be incapable of paying adequate rents or meeting the Trust Act's financial priorities for tenant selection." One individual states that the Trust makes no attempt to explain why "virtually any kind of business one might find in a Silicon valley office park" belongs in a national park "beyond vague references to 'changed economic opportunities'." Commentors sharing this view support the reintroduction into the PTIP of the tenant selection criteria outlined in the GMPA.

Response TS-2 – As explained in the Final Plan, the Trust proposes not to target as tenants only organizations devoted to "addressing the world's most critical environmental, social, and cultural challenges" as envisioned by the GMPA. Requiring tenants to have a business mission related to solving world problems further limits an already limited pool of tenants willing to locate at the Presidio and to contribute toward the rehabilitation of its buildings and landscapes. The Trust believes that such a constraint would introduce unnecessary risk to the Trust's ability to discharge its foremost responsibility – the timely preservation of the park's resources for the public in perpetuity.

Some commentors assert that tenants consistent with the GMPA vision would provide an ample pool of Presidio tenants, speculating that these tenants might be able to pay adequate rents or meet Trust Act financial criteria. Thus, they conclude, the Trust should limit the pool of tenants to those who fit within the overlap of both the GMPA (as one commentor lists: tenants whose focus is environmental, philanthropic, conflict resolution, international relations, and arts) and Trust Act tenant categories. These commentors say the Trust should make this decision because there is no evidence to the contrary.

The Trust's leasing experience to date and its understanding of the real estate market are the bases for the Final Plan's approach to leasing. The Trust believes the commentor's desired approach – limiting the tenant pool to GMPA-type tenants and then waiting to see whether and when they would be willing to lease the Presidio's building space – is imprudent.

While undoubtedly there are some additional tenants who fit both the GMPA and Trust Act financial criteria and are willing to sign long-term leases, their number is limited. Since the time the Thoreau Center lease was concluded, the Trust has advertised many other lease offerings to these as well as a wider variety of tenant types. For example, when the Trust solicited proposals for the Letterman Complex specifically identifying the preferred research and education user specified in the GMPA no such user came forward. The Presidio Trust's notice of the availability of the RFQ for the Letterman Complex was sent to about 4,000 prospective users. The RFQ itself was sent to 2,400 organizations based on the response to initial mailing and targeted user groups. Consistent with the GMPA biotechnology and medical research companies and organizations were included in the targeted user groups. The Trust identified prospective tenants using Dun and Bradstreet national listings for tenants in specific industries and San Francisco Bay Area listings of largest companies in specific industries. Industries targeted from the national database included Scientific Research and Development Services (SIC 5417) and pharmaceutical and medicine manufacturing (SIC 3254). Locally, the largest employers in the following areas were contacted: biotechnology/biopharmaceutical companies, medical device companies, and hospitals. The extensive outreach was made in an effort to bring forth a scientific research and education user capable of offering to implement the specific use proposed in the GMPA for the LAMC/LAIR site. Finally, the Trust made an extensive outreach to the real estate brokerage community in an effort to reach users actively seeking space so that in the absence of a qualified respondent for this preferred type of use, the Trust would have other alternatives, supported by the market, to consider.

The Trust received responses from 18 submitters, and rejected the majority of proposals either because they failed to meet the minimum standards for development, including consistency with the General Objectives of the GMPA. The Trust ultimately studied four market-based alternatives. Although commentors would have preferred that the Trust study alternatives that involved a different program focus or different mix of organizational types, no minimally qualified proposers came forward to offer any such alternatives, and they were therefore not included within the range of users considered by the Trust.

Similarly, when the Trust has put out leasing solicitations for other buildings, users of the type identified in the GMPA simply have not responded. In one instance, the Trust prepared a lease solicitation targeted to foundations of the specific type contemplated by the GMPA. The Trust identified 2,872 prospects for the lease offering of Buildings 103/104. These buildings are considered by some to be the signature historic buildings on the Main Post, likely to be desirable to a wide audience. Some of the original 2,872 prospects were eliminated for various reasons, often due to the foundation's own requirements. (For example, an Idaho foundation was screened out because it only funded philanthropic projects in Idaho.) The Trust ultimately mailed solicitations to 1,766 prospects, including brokers, related data bases, and non-profit organizations that could spread the announcement of the offering more widely. The Trust received only two expressions of interest. One of the respondents, the Moore Foundation, a newly-created philanthropic organization funded by Intel executive Gordon Moore, is a benefactor for international environmental and biodiversity projects, and is now renting space within Building 38 as a subtenant of the master tenant who funded the historic rehabilitation of that building. As it turned out, the offering of Buildings 103 and 104 has not resulted in any viable proposal for their reuse by GMPA-type tenants to date. No doubt, the complexity associated with the building rehabilitations presents economic uncertainties that have thus far been unacceptable to prospective users.

These and other examples point out the complexities and variety of obstacles that must be managed and overcome to successfully lease the type of building space available within the Presidio. To impose yet a further constraint on successful leasing by limiting the prospective pool of tenants to those who fit the relatively narrow criteria of the GMPA risks the imposition of so many constraints as to tempt failure.

The pool of potential tenants is already limited by the Presidio's location several miles removed from San Francisco's downtown and the complexities of its available building space. The historic nature of many Presidio buildings, as well as their layout and capacity for structural changes, limit their suitability for certain types of tenants. Interested parties often do not have the capital to rehabilitate the space. In addition, the Presidio is not as accessible to public transportation, business centers, or conveniences as other competing locations. To restrict the pool of prospective tenants still further would make the mission of the Trust – ensuring the preservation and enhancement of park resources – more difficult. For these reasons seeking a diverse range of tenants is prudent policy. Also, a diverse tenant base mitigates the effects of inevitable economic downturns, weakness in or demise of any particular sector, and changing social trends. Over time, diversity will create a more robust and stable base of tenants, making the long-term preservation of park resources more likely.

The GMPA requirement that Presidio tenants in general will provide park programs related to the GMPA's vision of addressing the world's most critical problems has proven to be difficult to police and impractical to enforce. Further, requiring tenants to pay directly for park programs – often in addition to making a substantial investment in rehabilitating a building – creates further disincentives to lease Presidio space. Finally, the rehabilitation of historic buildings for reuse is complicated, and there is a limited pool of prospective tenants with the experience, skills, and financial wherewithal to undertake such projects. In the judgement of the Trust, the basic policy goals of the Plan, such as increasing open space and rehabilitating hundreds of historic buildings, cannot be accomplished solely by organizations of the type specified under the GMPA.

TS-3. ***Tenants Who Make Financial and Other Contributions to the Park***

A number of commentors, including several San Francisco planning and civic organizations and businesses, recognizing that the appropriateness of tenants has been a "contentious issue," are supportive of the Trust's proposal to seek tenants who make financial and other commitments to the park. San Francisco Beautiful "strongly believes that whether a tenant's economic model is or is not for profit should not be the test of appropriateness. A better test is what benefits the tenant offers to the public, as well as their ability to enhance the financial viability of the Presidio." SPUR is optimistic that the Trust "will be able to attract tenants who make financial and other commitments to the life and vitality of the Presidio." Others applaud the Trust's efforts to "bring to the park 'value-added' tenants whose presence adds to the attractiveness of the Presidio…" ("We are delighted that you were able to attract a world class organization like George Lucas and believe it will

add immeasurably to the Presidio—we will all be the beneficiaries. It would be great to see more such world class organizations as tenants, helping financially and in so many other respects.") One individual "endorses" the tenants that the Trust has selected thus far, and doesn't believe that any particular "litmus test" needs to be applied to prospective tenants.

Response TS-3 – Not all commentors asked the Trust to limit itself to selecting GMPA-type tenants or to de-emphasize financial criterion as an important component of tenant selection. The Trust recognizes, however, that most of these commentors also express the importance of attracting among this group of tenants those with a willingness and ability to make other commitments to the park. The Trust agrees with these commentors that tenants should have something to offer the public. The second of the three tenant selection criteria articulated in Chapter Four of the Final Plan is responsiveness to the General Objectives of the GMPA and contribution to the visitor experience. Thus, the Trust will encourage contributions from park tenants and will select tenants based not only on their ability to meet financial criteria, but also their willingness to make other contributions to the park and its visitors. In the Trust's view, contributions to the visitor experience could be made in a wide variety of ways. Some tenants may design and offer their own program or special events directly to park visitors; others may create or enhance space that serves the public; others may donate volunteer services to existing programs, such as park stewardship programs or ongoing resource protection programs. Still others may offer interpretive media or other special services. These are only examples, and the form of tenant contribution is almost unlimited.

The Trust is not pre-selecting the precise way in which any given tenant must contribute to the visitor experience, to the park, or to park programs. In the changed context in which the park must pay for itself, in some cases a tenant's best contribution may be providing capital funding to improve a building or rent to pay for other non-revenue generating goals without a substantial programmatic contribution. In other instances, tenants who meet a basic financial standard for an offering may be selected primarily for their programmatic contribution to the park and the visitor experience. It is the Trust's responsibility and challenge to find the appropriate balance between financial and programmatic contribution, and the tenant selection approach of the Final Plan is the means by which the Trust anticipates it will accomplish this goal. As stated in Chapter Four of the Final Plan, "Preferred tenants will serve the public interest, and will meet all three selection criteria" articulated.

TS-4. ***Mix of Tenant Types***

Commentors offer their suggestions for the types of tenants that should be included within the mix of Presidio tenants. Some commentors provide examples, including gas stations, grocery stores, bait shops, bike rentals, cleaners, drug stores, a small supermarket, cafes, a few small shops ("to make the park more livable and also be another source of income," "bring back to life the old buildings," "services to support a resident population," "visitor amenities are vital"). Others feel that retail needs besides convenience store-style retail are better elsewhere ("do not duplicate tenants that are in the Marina, downtown, rest of city…"). One individual recommends medical services ("especially for the volunteers at the Native Plant Nursery"). Another individual thinks that "Industrial Light and Magic should make a nice addition to the area," and yet another requests "schools, etc. not just corporations." Educational institutions are mentioned frequently ("educational tenants and preschools," "a unique Nature and Technology High School—a magnet boarding school," "K grade schools," "a leading, world class university.") Still others are less specific and ask questions ("can a fuller description of prospective tenants be included in the FEIS?"), or provide objectives ("ensure the viable presence of a variety of enterprises that echo the heterogeneity and diversity of the American economy," "ensure that the Presidio is not a reflection of simply one business point of view"), and guidelines ("keep business, and subsequent traffic, out. We need parks, not buildings, not businesses…').

Other commentors offer opinions on the type of tenants the Trust should avoid. One individual states that the Trust makes no attempt to explain why multimedia, telecommunication, internet, software, and other high-tech corporations belong in a national park. A commentor points out financial risks inherent in tenant selection that could "easily favor 'here today, gone tomorrow' (yet well-funded) technology startups." She asks, "What if most of the Presidio's office space had been rented to dot-coms last year? Wouldn't most of the space be empty today, as it is elsewhere in the Bay Area?" The

NPS offers a warning ("Should the ultimate mix of tenants contain a predominance of private business tenants, this could have the effect of making the Presidio less open, inviting and accessible to the general public").

Response TS-4 – The Trust Act provides criteria to guide the mix of tenants at the Presidio. In keeping with the Trust Act (Section 104(n)), the Trust will consider the extent to which prospective tenants contribute to the implementation of the General Objectives of the GMPA. To achieve this goal, the Trust will make every effort to locate and find qualified tenants involved in stewardship and sustainability, cross-cultural and international cooperation, community service and restoration, health and scientific discovery, recreation, the arts, education, research, innovation, and communication. See Chapter Four of the Final Plan. All of these endeavors are derived from, and consistent with, the focus of the GMPA and are therefore embodied in the Trust Board's Resolution 99-11 stating the GMPA's General Objectives. In addition, the Trust may consider other users who bring value to the park in other ways, such as the ability to rehabilitate an historic building, and capacity to contribute to the vitality of the community.

In response to commentors' suggestions, the Final Plan provides for varied users, and no single type of use or user predominates. As some commentors suggest, the Plan allows for some convenience-type retail, such as cafes or small service stores, to serve the basic needs of Presidio residents, employees, and visitors. The intent is not, however, to make the Presidio into a retail shopping area, to duplicate the activities of nearby businesses, or to create an extension of nearby retail areas. Furthermore, although some comments suggest otherwise, the Trust is not proposing to focus tenant selection primarily on private business tenants or on any one sector, even from among those listed above within the General Objectives. The Presidio will remain predominantly park-like, with nearly three-quarters of its area as open space. Office uses will comprise only about one-third of the total building space. A mix of large and small, for-profit and non-profit, long-standing and recently created organizations will occupy this space. In response to those commentors requesting education-related uses, these too will be accommodated, and their exact nature will be determined during Plan implementation.

The Trust does not now and does not propose in the Final Plan to focus its tenant selection on multimedia, telecommunications, software, high-tech, or any other particular business sector. It is true that a year or more ago, some prospective tenants within these sectors leased building space at the Presidio, but that was largely due to the unprecedented condition of the market at the time. Market rents and business creation in the "dot-com," high-tech, and software sectors were at an all-time high and vacancy rates elsewhere in the region were at an all-time low. Many existing or start-up organizations were willing to rent space at almost any price wherever they could find it, including at the Presidio, which, unlike other areas, had available space. That situation has changed, and the Trust's approach to long-term tenancies at the Presidio will not focus on these sectors or any other single one business sector.

Other comments complain that the Trust should not limit itself to or allow an overabundance of for-profit business tenants. Again, the Trust does not and is not proposing to limit tenant selection to a single business model. In response to commentors who asked the Trust to articulate more concretely the place for non-profit organizations in the Presidio community, the Trust agrees with the commentor who stated "whether a tenant's economic model is or is not for profit should not be the test of appropriateness." The tenant selection criteria allow for a broad mix of tenants, and tenant diversity is embraced as the Trust's policy. See Chapter Four of the Final Plan.

The current mix of approximately 60 non-residential tenants varies widely, and more than half are non-profit organizations occupying almost 600,000 square feet of building space (out of about 900,000 square feet of occupied space). Some of the existing non-profit tenants are large organizations offering services and programs directly to the public. Other non-profit tenants are small organizations that advocate social causes that transcend the day-to-day experience of park visitors. For-profit tenants also range from large to small, and from those that directly interact with park visitors to those that likely go unnoticed by most visitors. The Plan calls for continuing development and retention of a diverse tenant mix without limiting the potential tenant pool based upon business structure or purpose.

Some commentors seem concerned that the Trust's goal is to seek out more or mostly corporate "powerhouse" tenants like Letterman Digital Arts, Ltd. (an

affiliate of Lucasfilm Ltd.), which will redevelop the 23-acre Letterman Complex site for a digital arts campus. As noted above, the Final Plan does not eliminate from consideration tenants that are successful for-profit companies, but commentors need not be concerned over a duplication of the LDAC project elsewhere in the Presidio. The LDAC project is unique. No other site at the Presidio combines the same characteristics as the 23-acre Letterman Complex (i.e., demolition of large obsolete non-historic buildings to allow new replacement construction), and no other single tenant is expected to occupy as much space (i.e. 900,000 square feet).

TS-5. ***Tenant Subsidies***

The Sierra Club comments that no "tenants should be accepted that would pose a continuing operating subsidy or other financial demand on the Trust." Others believe financially stable tenants should help underwrite the needs of desirable, but possibly under-funded tenants. One individual remarks "having some tenants pay market rate, while non-profits pay a reduced rate is working, and no further fees should be placed on market rate paying tenants."

Response TS-5 – As a general policy matter, the Trust does not favor and will not rely on tenant subsidies to engineer the tenant mix. The Trust's approach is to allow the marketplace to deliver a diverse tenant mix, something that is expected to evolve in part because none of the building space at the Presidio is considered to be premium Class A space such as that found in downtown San Francisco. The Presidio's non-residential building space is a mix of Class B and C office space that is likely to attract a wide range of small-to medium-sized users. Consequently, the Presidio is not in competition for and is not expected to draw the high-end corporate users of the nature that concerns some commentors.

Although the Sierra Club prefers that no tenant be subsidized or create a financial demand on the Trust, the strict interpretation of this comment would mean that the Trust would select only the highest bidder. That is not the Trust's intent. This comment also seems at odds with the Sierra Club's desire that the Trust limit itself to tenants contemplated under the GMPA, many of whom would be non-profits who may be less likely to be the highest bidder. To provide a diverse tenant mix, the Trust will select some tenants who primarily offer a financial contribution to the park. Others may be selected primarily for the importance of what they can contribute to the park community. The Trust's preferred tenants will be those who meet both criteria.

For obvious reasons, the Trust must avoid subsidizing tenants, and will require tenants to demonstrate the overall feasibility of their lease proposals, including the feasibility of funding capital improvement and ongoing operating expense. Nonetheless, in its commitment to tenant diversity, the Trust expects to use a variety of approaches. As explained in Chapter Four of the Final Plan, the Trust may encourage master tenants to sub-lease to desired organizations or seek partnerships with philanthropic organizations to support tenants that might no otherwise be able to locate at the Presidio.

TENANT SELECTION CRITERIA

TS-6. ***GMPA vs. Trust Act Tenant Selection Criteria***

Various commentors, including the CCSF Planning Department and NAPP, request that the Trust retain the GMPA tenant selection criteria. Various other commentors, including three historic preservation groups, feel the Trust should select tenants that conform fully to the provisions of Section 104(n) of the Trust Act. They assert that the Trust Act requires that priority be given to tenants "that facilitate the cost-effective preservation of historic buildings through their reuse of such buildings," and that the Trust's tenant selection criteria do not reflect this priority.

Response TS-6 –The tenant selection criteria set forth in the Final Plan combine the requirements of the Trust Act concerning tenant selection with elements from the GMPA that placed a premium on tenant contribution to the park and its visitors. Under the Final Plan, Presidio tenants will be selected on the basis of the following three criteria: (1) demonstrated ability to enhance the Presidio's financial viability and/or rehabilitate and reuse an historic building, thus contributing directly to the Trust's primary goal of resource protection; (2) responsiveness to the General Objectives of the GMPA and contribution to the visitor experience; and (3) compatibility with the planning principles and preferred uses articulated in the Plan. The first criterion is derived directly from Section 104(n) of the Trust Act, which requires the Trust to "give priority to the following categories of tenants: Tenants that

enhance the financial viability of the Presidio and tenants that facilitate the cost-effective preservation of historic buildings through their reuse of such buildings." The second criterion derives from the Trust Act's requirements that the Trust "consider the extent to which prospective tenants contribute to the implementation of the general objectives of the General Management Plan for the Presidio…." The third criterion ensures consistency with the PTMP, including its policies, objectives, and land use framework.

The Trust's goal is to identify tenants who serve the public interest and meet all three selection criteria. In instances where it is not possible to identify such tenants, the Trust may consider users who would have a neutral effect on the Presidio's visitor experience or long-term financial viability. For further explanation of why the Trust chose to adopt in PTMP tenant selection criteria that modify what was set forth in the GMPA. Refer to Responses TS-1 and TS-2.

TS-7. ***Application of Tenant Selection Criteria***

Some commentors offer recommendations for appropriate tenant selection criteria and how the Trust should prioritize or apply its tenant selection criteria. A number of commentors urge that the Trust should not select tenants strictly on their ability to pay or place financial contribution on par with a tenant's program contribution ("tenant selection should emphasize the importance of visitor and educational program contributions," "PTIP should not put contributions to the visitor's … experience on par with financial contributions," "do not place a premium on financial considerations above the tenant's contribution to the park's program"). Many of these commentors ask that the Trust give more weight to the programmatic contribution element of the tenant selection criteria. ("NAPP recommends the following tenant selection priorities: tenants should be related to the mission and objectives of the GMPA and GGNRA; a preference should be given to tenants that serve the public, rather than private interests; tenants should be fiscally responsible.") Two commentors, including San Francisco Beautiful, invite the Trust to seek tenants who contribute to the park in two or more ways ("by directly providing a program to park visitors, by contributing financially, or by offering in-kind services to a park program," "…including park programs, public outreach and access, and financial contribution"). Others, such as PAR and the NPS, would apply a threshold financial standard. They recommend that once candidate tenants are found to meet minimum financial standards for a given site, priority should be given to those tenants with a mission or business purpose related to park themes. ("Though a financial proposal can be a baseline requirement for tenant suitability, the next level of the selection process should address the contribution of the tenant to the realization of the park vision through the delivery of distinctive programs. This would allow a greater possibility of tenants who would become actively involved in the mission and community of the park, which would in turn allow more interaction between tenants and park visitors. An ultimate result could be greater accessibility to the historic structures…. The NPS recommends that the Trust give stronger weight to the programmatic contribution element…."). The CCSF would make public access among other criteria a priority ("it is important that the PTIP… accept only public purpose tenants who are committed to the widest possible public access rather than private companies or elite resorts which serve to limit such access;" and "tenant selection must consciously rely on criteria such as the amount of outdoor and indoor public access space, types of programs promoted, and hiring and workforce diversity.") The CCSF Planning Department also addresses other lease commitments and asks the Trust to provide a detailed method for allocating a fair-share portion of in-kind or in-lieu fee payment program responsibility to tenants ("…a detailed plan, including the total cost and method of allocating a fair share portion of programs or services or financial contribution to each tenant is not presented. Such contributions should be a primary condition of lease terms under the PTIP if the program commitments of the GMPA are to be honored, and developing a plan for imposing such lease commitments is a necessary first step").

Response TS-7 – The Trust's tenant selection criteria are set forth in Chapter Four of the Final Pan and in Response TS-6, above and encompass a tenant's financial contribution as well as a contribution to the park programs and visitor experience. Although many commentors would prefer that the Trust minimize the importance of a tenant's financial contribution, the Trust Act (Section 104(n)) made this criterion an important consideration and priority: "The Trust shall give priority to … [t]enants that enhance the financial viability of the Presidio and tenants that facilitate the cost-effective preservation of historic buildings…" See also Response TS-1 above. With

this in mind, the Trust cannot give financial contribution a reduced priority as is recommended by some commentors.

Instead, the Trust approach is articulated in the Final Plan as the goal that preferred tenants meet all three criteria. See Response TS-6 above. Nevertheless, in instances where it is not possible to identify such tenants, the Trust may consider and select other users who do not meet all three criteria but nonetheless bring value to the park. Also, non-residential tenants will be required to pay "service district charges," with which the Trust funds police, fire, road maintenance, and other park-wide services. Other lease terms will be determined on a case by case basis and are beyond the scope of this general planning effort.

The Trust will encourage tenants to make contributions to the park in ways that are not merely financial. For further discussion of this point, refer to Responses TS-3 and PR-2. That said, not all tenants can or will provide park programs, nor will the Trust require in its leases that all tenants provide park programs. Although a compelling idea, any such immutable requirement or standard is impractical. Leasing the building space at the Presidio presents a unique set of challenges. The pool of potential tenants is already limited by the Presidio's location and the complexities of its available building space. The historic nature of many Presidio buildings, as well as their layout and capacity for structural changes, limit their suitability for certain types of tenants. Tenants, even if interested, may not have the capital to rehabilitate the space. In addition, the Presidio is not as accessible as other competing locations. For these reasons, the pool of tenants is already restricted. Imposing further tenant restrictions, such as the lease requirement to provide a park program, would further limit an already restricted tenant pool. Furthermore, the Trust is not in a position to enforce a requirement that every tenant provide visitor programs. Every effort will be made to select tenants willing to contribute programmatically to the park and to encourage the implementation of programmatic ideas that are offered, but in the end such contributions will be voluntary.

Similar problems exist with commentors' suggestions about giving high priority to public purpose tenants offering public access. With respect to selecting only public purpose tenants. Refer to Response TS-2. With respect to requiring tenant commitment to "the widest possible public access," this standard too is unworkable. Office tenants, whether serving a public purpose or private business interest, have a reasonable expectation that leased office space will not be fully available to the public. Some commentors appear to assume that organizations with a mission related to addressing social and environmental problems (the so-called "public purpose tenants" referred to in comments) would hold open their leased space to any member of the public or any park visitor desiring to enter the building. In the Trust's experience, this space is leased and used as office space and is not more accessible or available to the public than any other office space, whether leased by public-serving or private, non-profit, or for-profit organizations. The Trust understands that the historic building resources of the Presidio are an important resource to be visited and experienced by park visitors. It is the Trust's goal to interpret the Presidio's historic buildings for the public and to work with each of its tenants to accommodate public access appropriate to interpretive goals that are compatible with the building use. The Trust is keenly aware that "the Presidio is a public treasure that should be available to the public at large." It is with this understanding that the Trust, rather than committing to choose only those tenants that will provide public access to their leased space, chooses instead through the PTMP to provide that nearly three-quarters of the Presidio will remain public open space and to expand the publicly available and public-serving cultural and educational building uses beyond what the 1994 GMPA offered.

OTHER CRITERIA

TS-8. *Quotas, Minority-Owned Business, and Other Criteria*

One commentor alludes to tenant type quotas by asking what percent of the office space will go to non-profit versus private sector businesses and what amount of square footage this would be. This commentor also asks what kind of economic development will be prohibited, discouraged, and accommodated. Another asks the Trust to ensure that "even minority-owned, or non-profit, or emerging businesses could be accommodated proportionately along with the powerhouse, corporate ventures so favored for necessary economic stability and sustainability." Two other commentors infer that building occupancy should be as low as possible to maximize income but limit

the number of people in the Presidio. ("I recommend that preference be given to businesses that require little to no customer visitation to reduce the coming and going of car traffic.")

Response TS-8 –The Trust is committed to attracting and retaining a diverse tenant mix, and will not limit the potential tenant pool to those of a particular business structure or purpose. Neither will the Trust set quotas or establish outright prohibitions by tenant type. The pool of potential tenants is already limited by the Presidio's location, the difficulties of attracting qualified tenants, and the complexities of its available leasing space. See Responses TS-2 and TS-7. Seeking and maintaining a diverse range of tenants is prudent policy, and the Trust sees no need to establish tenant quotas. Over time, pursuing diversity, including minority-owned businesses, non-profit groups and for-profit businesses of all sizes, without quotas or prohibitions other than the principles set forth in the Plan, will create a robust and stable base of tenants, making the preservation of park resources more feasible.

TS-9. ***Public Process on Tenant Selection***

Several commentors request a commitment from the Trust for annual reporting of the tenant mix and programs being provided ("since programs are such a key element of the Presidio's future, there should be some tracking, monitoring and accountability in place for achieving stated goals and programs.") One individual advises that the public should remain well-informed and part of the comment process in regard to the selection and maintenance of tenants. The Sierra Club adds a request that once buildings are rehabilitated in preparation for lease, the public should be included in the review of uses included in RFQs and RFPs. The GGNRA Citizens' Advisory Commission seeks a public explanation for the basis of any tenant selection decision that appears to differ from the general objectives of the GMPA.

Response TS-9 – The Trust's tenant list is public information available to anyone. The Trust website lists every non-residential tenant's name, address, telephone and facsimile numbers, email address, and website (when available). Similarly, lease offerings are public. All buildings that are offered for lease are posted on the Trust's website, and copies of all lease offerings are available in the Trust's offices. Members of the public who express interest in a particular building or group of buildings are added to the mailing lists maintained by the Trust's real estate department. When buildings are offered for lease, individuals on the mailing list receive written notice. The Trust also gives notice of lease offerings through email. With respect to the RFQ and RFP process, many large-scale reuse projects will include public workshops that allow public input into review of project-specific planning guidelines and reuse principles for those projects. There will also be public notice given of the availability of all such offerings, most often by email and mail notification to mailing list and other interested parties.

4.33 IMPLEMENTATION (IM)

CONTENTS

Comprehensive Management Program (CMP)

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IM-7. *Implementation Strategy*

COMPREHENSIVE MANAGEMENT PROGRAM (CMP)

IM-1. *CMP to Satisfy Trust Act Requirement*

The NRDC asks the Trust to reconsider and clarify its obligations with regard to the comprehensive management program requirement in Section 104(c) of the Presidio Trust Act. They suggest that only a single comprehensive document can meet the program requirement and that the PTIP should be made more specific in order to serve as the CMP. The NRDC's letter states that the Trust has already developed much of the information needed to identify buildings to be upgraded, demolished and constructed and the size and location of each. We would expect this information, used in developing the plan and EIS and made available to commentors who requested it, to be part of the CMP. The NPS asserts that the "crucial" requirement of the CMP is the full evaluation of all possible demolition, particularly of historic structures, and new construction in the park. They also ask that this evaluation be completed as part of the PTMP.

Response IM-1 – Section 104(c) of the Presidio Trust Act requires the Trust to develop a comprehensive "program" for management of Area B. The management program would consist of the demolition of structures identified for demolition in the GMPA that in the opinion of the Trust cannot be rehabilitated cost-effectively, the evaluation of buildings in categories 2 through 5 of the 1985 Historic American Building Survey (HABS) Report for possible demolition, the consideration of opportunities for new construction within existing areas of development, and an examination of options for administrative and facility management functions.

Although some commentors assert otherwise, nothing in the Trust Act requires that the management program referred to in Section 104(c) be set forth in a single plan or document. Indeed, Congress' choice of the word "program" rather than plan carries the connotation of an ongoing endeavor rather than a one-time snapshot. PTMP is the foundation of the program and establishes the framework within which the more specific evaluations and decisions mentioned in Section 104(c) will proceed. It is not and need not be the complete Section 104(c) management program. The program consists of the Trust's administrative management procedures and policies, options for which have been considered in the PTMP planning process. The ongoing evaluations and future decisions related to specific building reuse, rehabilitation, demolition, and new construction that will follow from PTMP's land use and square footage framework, area-wide planning principles, and character-defining features of each planning district will build upon the foundation established by PTMP to round out the program.

Congress' intent in imposing the requirement of Section 104(c) was to cause the Trust to develop a cost-effective and realistic program for administering and protecting the Presidio: "Subsection [104(c)] directs the Trust to develop a program to reduce costs associated with the Presidio. The Committee finds that the cost of the plan for the Presidio as completed by the NPS is unrealistic. While the Committee does endorse the general objectives of that plan, the Committee recognizes that development of a reasonable program is

essential to ensure the success of the Presidio Trust and the long-term preservation of the historical and other resources of the Presidio."[1]

As the commentors have recognized, Section 104(c) contemplates that the Trust will evaluate whether to rehabilitate and reuse or to demolish some 600 structures in Area B. They also recognize that Section 104(c) allows the Trust to consider sites for new replacement construction as a management program option. If the Trust were to make all decisions enumerated in Section 104(c) through a single document or plan, it would have to do so in the absence of actual viable proposals capable of implementation. That and the mere lapse of time between adoption and implementation of such an expansive range of decisions would render such decisions abstract, unrealistic and impractical. Evaluating in the abstract the cost-effectiveness of retaining and reusing specific structures or the financial implications or suitability of new construction without reference to current market forces and economic conditions is impractical. In each instance of possible rehabilitation, reuse or new construction, the Trust must be able to consider the options for attracting an actual, viable proposal in the context of the existing market realities and the overall objectives of the project. Furthermore, decisions about the cost-effectiveness of retaining, reusing, demolishing and replacing buildings are likely to be affected by lessons learned as the Trust undertakes more such activities in furtherance of its dual objectives of preservation and economic self-sufficiency.

Some commentors have asserted that the Trust has already developed "information needed to identify buildings to be upgraded, demolished and constructed and the size and location of each." These commentors also suggest that the Trust in fact used building-specific information to prepare the EIS and therefore should convert these assumptions into final decisions about building-specific uses and treatments. This suggestion demonstrates a misunderstanding about the purpose for which such information was derived. In the course of developing the PTMP's general land use framework, Trust staff looked at the number, size, layout and other characteristics of buildings within each planning area. This information concerning the buildings that are currently located in Area B was used in the EIS and is and has been publicly available. That public information was then used to develop hypothetical alternative assumptions about the overall land use possibilities within an area and the square footage framework. This type of information had to be taken into account because the Trust is constrained under the terms of the Trust Act to a Presidio-wide square footage cap and each planning alternative itself was also constrained by its own square footage cap. These assumptions, representing a range of alternative scenarios to be considered under NEPA, are hypothetical reasonable possibilities. Therefore no single set of underlying assumptions, even if made for purposes of the EIS analysis, represents or should be construed as actual building-specific or site-specific land-use decisions that will be implemented by the Trust.

The PTMP has been developed as a programmatic plan. See generally responses to Type of Plan comments. With few exceptions, the PTMP establishes general land use categories and square footage limits within broad district and Presidio-wide boundaries. In a few limited instances, it states preferences for use of certain identified buildings, but otherwise makes no building-specific use decisions. Decisions about future specific building treatments will be made on the basis of actual market data consistent with the overall land use plan and policy objectives established in the PTMP rather than hypothetical assumptions developed to formulate a range of alternatives under NEPA. This approach is a direct reflection of the reality that it is impractical to make decisions about the financial cost-effectiveness of specific building uses and treatments in the absence of specific, real-world, market-based proposals.

IM-2. ***Include CMP in PTIP to Assess Cumulative Effect on the NHLD***

The NPS asserts that the Trust must complete as part of PTMP all of the building- and site-specific evaluations called for as part of the Section 104(c) management program in order to provide an adequate assessment of "the cumulative potential impact on the status of the Presidio as a NHLD." ("[T]he lack of information provided in the PTIP and DEIS have not allowed a complete assessment of potential effect on the NHLD.... If NHLD status were lost, this could threaten the continuation of the Presidio as part of the national park system.") The NPS continues: "Although the 1985 HABS report is

[1] H.R. Rep. No. 234, 104th Cong., 1st Session (1995)

required by the Trust Act to evaluate whether historic structures are economically viable for rehabilitation, the 1993 update…is the base document for … comprehensive assessment of impacts to park resources…."

Response IM-2 – The Trust disagrees with NPS that the evaluations under Section 104(c) are needed to assess environmental impacts on the NHLD. The evaluations called for under Section 104(c) serve an entirely different purpose – to evaluate the economic viability of building retention versus demolition – which cannot be done except in the context of a specific and real proposal for reuse. The Section 104(c) evaluation is not, as the NPS correctly points out, the basis for impacts assessment, and therefore these evaluations need not be the predicate for assessment of impacts on the integrity of the NHLD. For the reasons discussed in Response IM-1, it would be speculative to complete all building- and site-specific building treatment evaluations called for in Section 104(c) as part of this current programmatic plan. These evaluations will be undertaken in the future as discussed in Response IM-1.

The PTMP EIS provides an appropriate and fully adequate program-level assessment of potential direct, indirect and cumulative effects on historic and cultural resources for each of the six programmatic planning options. It looks at potential levels of demolition and new construction within planning districts and across the Presidio as a whole, and evaluates the potential for significant effects given the integration and application of the Planning Principles and district Planning Guidelines for all alternatives. Mitigations are defined and provide protections needed to ensure protection against or minimize adverse effects to individual historic resources and to ensure protection of the integrity of the District.

IM-3. ***Repeal CMP Provision***

The Fort Point and Presidio Historical Association requests the Trust to seek a legislative repeal of the CMP provision requiring the Trust to consider certain structures for demolition based upon the HABS Report. They ask that the CMP include a specific commitment that the Trust will maintain all historically significant buildings in an adequate state of preservation until they can be reused.

Response IM-3 – The Trust notes the commentor's suggestion. In the context of the PTMP planning process, the Trust cannot assume a change in the statutory provisions of its enabling legislation. That said, the Trust Act Section 104(c)(2) does not require building demolition, only that the Trust "evaluate for possible demolition or replacement" those buildings identified in certain categories in the 1985 HABS Report. The Trust Act does not suggest that buildings be prioritized for demolition based solely on their ranking in the HABS Report or that any building actually be demolished – simply that an evaluation occur. The Final Plan makes a firm commitment to protect the historic character and integrity of the NHLD, and commits to using all reasonable efforts to adapt historic properties to new uses. Furthermore, the Trust would be subject to Section 106 of the NHPA as well as NEPA regarding the proposed removal of an historic building. Please refer to Chapter Four of the Plan for a discussion of the compliance process, including public involvement, associated with future actions.

IMPLEMENTATION PRIORITIES

IM-4. ***Considerations for Future Projects***

The National Trust for Historic Preservation requests that the Final Plan and EIS be revised to state that, in considering proposed projects, avoiding adverse effects on historic resources would take precedence over financial considerations. ("The implementation strategy lists four considerations, in no particular order, for prioritizing future projects… In some cases, the Trust's responsibility to maintain historic resources may conflict with efforts to maximize economic return. The preservation of historic resources should not always be subordinated to financial considerations.")

Response IM-4 – Chapter One of the final plan sets forth the Planning Principles that will guide the protection and enhancement of the Presidio's historic resources, the balance of the plan reiterates the Trust's priority and commitment to the rehabilitation and reuse of historic properties at the Presidio. The Final Plan's implementation strategy has been modified and elaborated to better explain the Trust's approach to setting implementation priorities. Please refer to Chapter Four, "Resource Preservation and Enhancement: Priorities and Timing" of the Final Plan. As stated in the Final Plan, "the Presidio Trust's success will be measured largely by the timely

rehabilitation and reuse of the Presidio's historic buildings and landscapes, the quality and quantity of open spaces that are created or enhanced, and the extent to which these accomplishments and the park resources they address are understood and enjoyed by park visitors." The availability of funding will help determine when park resources can be rehabilitated and enhanced, therefore the Trust will continue to give priority to capital improvements that generate the revenue to fund subsequent capital improvements and operating expenses. However, the Trust also acknowledges that other near-term projects will be necessary to safeguard park resources, achieve resource preservation goals, and provide visitor programs and amenities.

Economics is one of the factors considered in the management of historic resources for any federal agency. Economic feasibility, or cost-effectiveness of rehabilitation and reuse will not be the primary factor in deciding the fate of a historic building or other historic resource; it will be just one of many criteria used in the decision-making process. The decision-making process for building treatments, including demolition, will be on a case-by-case basis and will be multi-faceted, not based solely on costs. Factors to be considered will include, in addition to others, historic and architectural significance, building integrity, economic feasibility of rehabilitation, and feasibility of reuse.

The draft plan's four factors for prioritizing implementation projects have been modified to emphasize the importance in protecting and enhancing valuable park resources, including those that contribute to the Presidio's NHLD status. They now read as follows:

"Through its annual budget and work programming process, the Trust will set priorities for uses and projects that are needed to (1) safeguard significant park resources; (2) preserve historic buildings, generate revenue, or reduce costs; and (3) finance preservation of buildings and landscapes, or enhancement and expansion of open space. Other priorities will include uses and projects that achieve resource preservation goals and that are immediately accessible or noticeable to park visitors or contribute to an approved implementation strategy…" (pages 122-123, Final Plan).

Lastly, in setting priorities, the Trust will consider factors such as the adequacy and availability of infrastructure, site remediation status, building conditions, the marketability of preferred land uses, the proximity of the project or use to existing activities and significant park resources, as well as public interest in the use or project.

IM-5. ***Prioritization of Implementation Actions***

SPUR recommends that the Trust put all its evaluation criteria in one place to "facilitate the public's ability to participate in the prioritization of the implementation actions that the Plan calls for." They suggest using an overall evaluation matrix or list rather than containing them in various places where the are hard to keep track of. An individual adds: "The Trust should put all limits, restrictions, and prohibitions on development in one place."

Response IM-5 – The Final Plan has been modified in response to comments to clarify and provide more detail about Plan implementation and public involvement. See the Final Plan, Chapter Four, Plan Implementation, Resource Preservation and Enhancement: Priorities and Timing. Included in this section is a general discussion about how the Trust will set priorities for projects and the critical relationship between project activities and funding. Under the backdrop of achieving self-sufficiency by 2013, the availability of funding will determine when park resources can be rehabilitated and enhanced; thus, the Trust will continue to give priority to those capital improvements that generate the revenue to then fund subsequent capital improvements and operating expenses. The Trust will set priorities for uses and projects that are needed to: (1) safeguard significant park resources; (2) preserve historic buildings, generate revenue, or reduce costs; and (3) finance preservation of buildings and landscapes, or enhancement and expansion of open spaces.

Chapter Four of the Final Plan also includes a discussion of ongoing implementation projects, as well as near-term and long-term activities. Figures 4.2A and 4.2B of the Final Plan illustrate these and a generalized timeline for implementation. Integral to near-term and long-term activities will be additional public involvement, as detailed in Final Plan Figure 4.3, Public Involvement in Planning and Implementation Decisions.

OTHER IMPLEMENTATION ISSUES

IM-6. ***Modifications to the PTMP***

The National Trust for Historic Preservation asks the Trust to define the criteria it will use, the process and any limits on future modifications, and the role for consulting parties and the public to comment on proposed modifications to the PTMP.

Response IM-6 – The Trust will monitor the Plan's effectiveness by tracking progress in meeting quantitative goals, such as the overall reduction in square footage, as well as qualitative standards such as conformance with planning district guidelines. The Trust will also use conventional planning and budgeting tools such as its annual budget and long-term strategic planning to monitor its progress toward financial self-sufficiency and completing the capital program. If the Trust desires to consider a planning proposal that is not consistent with the Plan, such proposals will be fully reviewed under NEPA, including all applicable public processes. The final decision on such a proposal may constitute an amendment to the Plan and will be informed by the public review process required by NEPA for the proposal. Chapter Four and Figure 4.3 of the Plan provides a discussion of monitoring and amending the Plan and public participation in decision-making on future actions.

IM-7. ***Implementation Strategy***

The Pacific Heights Residents Association (PHRA) provides multiple recommendations and opinions related to the roles and responsibilities of the Trust. The commentor proposes a new management structure with specific requests for the division of responsibilities between the NPS and Trust.

Response IM-7 – The United States Congress created the Trust, and its corresponding roles and responsibilities for the management of Area B, through enactment of the Presidio Trust Act in 1996. Changes to the management structure and redistribution of responsibilities, including but not limited to the suggestion that the NPS perform "overall management" at the Presidio and that the Trust report to the Secretary of the Interior, are contrary to the terms of the Trust Act, which is the Trust's governing mandate. The administrative changes suggested by the commentor would require further congressional action. The Trust considers itself bound to implement the statutory directive that Congress has provided.

4.34 CONSULTATION AND COORDINATION (CC)

CONTENTS

CC-1. *Endangered Species Act*
CC-2. *Coastal Zone Management Act*

CC-1. *Endangered Species Act*

The U.S. Fish and Wildlife Service (USFWS) and the California Native Plant Society request that the Endangered Species Act (ESA) discussion in the EIS explain the role of consultation in the context of the larger purposes of the ESA. San Francisco Tomorrow requests that the recovery program for endangered species be implemented in coordination with USFWS, and that Wherry Housing be removed in coordination with the USFWS Recovery Plan.

Response CC-1 – The Trust very much appreciates and has incorporated the explanation provided by the USFWS in its comment letter into the EIS. The Trust has initiated formal consultation pursuant to Section 7 of the ESA to implement the Final Plan, which will result in a Biological Opinion addressing anticipated effects of the project on listed species, including the two coastal plants featured under the USFWS Recovery Plan.

CC-2. *Coastal Zone Management Act*

The Bay Conservation and Development Commission (BCDC) comments that it has not had the opportunity to review the Draft EIS until its publication and has therefore not made the determination that the document addresses its concerns regarding Trust activities and programs that may affect the Commission's coastal management program.

Response CC-2 – Since publication of the Draft EIS and in response to this comment, the Trust has met with BCDC staff (in November 2001 and February 2002) to review their concerns regarding such issues as trails and public access, parking, building square footage, proposed PTMP uses, and natural uses as discussed in their letter of October 23, 2001 (see Chapter 5 in this document). As noted in their letter, BCDC's coastal management program would be consistent with Draft Plan goals to increase open space and recreational opportunities, preserve historic resources, rehabilitate native vegetation and riparian areas, preserve and enhance Bay views, protect water quality, establish a network of trails and bikeways through the Presidio, and encourage public transportation demand management strategies. The EIS has been revised to include a discussion of the Coastal Zone Management Act, the Bay Plan, and BCDC's consistency determination process. The Trust will cooperate wherever feasible in carrying out the Bay Plan, and will carry out its activities and programs that affect land or water uses in a manner consistent with BCDC's coastal management program (refer to Section 5.2 of the Final EIS for the Trust's consistency determination related to the PTMP alternatives).

RESPONSE TO COMMENTS

4. Responses to Comments

5. PUBLIC AGENCY COMMENTS

5. PUBLIC AGENCY COMMENTS

United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO
L7619 (GOGA-PLAN)

OCT 25 2001

James Meadows
Executive Director
Presidio Trust
P.O. Box 29052
San Francisco, CA 94129-0052

Dear Mr. Meadows:

On behalf of the Golden Gate National Parks, I am pleased to provide you with the comments of the National Park Service on the *Presidio Trust Implementation Plan* (PTIP) and its *Draft Environmental Impact Statement* (DEIS). The National Park Service supports efforts by the Presidio Trust to comprehensively plan for the future of the parklands under your jurisdiction at the Presidio. We are committed to ensuring that this entire national park site is preserved today and for future generations.

Planning for the Presidio is at a critical point as the future of this national park site is being determined. The NPS *General Management Plan Amendment* (GMPA) adopted in 1994 after four years of public involvement, presented an overarching vision for the Presidio. Clearly several factors have changed since 1994. Key among them is the mandate to ensure that the Presidio becomes financially self-sufficient by 2013.

We acknowledge that this mandate necessitates some revisiting of the GMPA. Yet we believe that the fundamental course for the Presidio as adopted in the GMPA should remain the same. The Presidio's unique park character – its significant cultural, natural, scenic and recreational resources – must be the cornerstone that guides our vision.

We urge the Presidio Trust to put this vision first. The Trust should stay on course for this important element of the national park system – a course that protects the integrity of the National Historic Landmark District, restores valuable natural resources, and preserves the visitor experience originally planned for this park. The National Park Service urges a stronger commitment to the national park character of the Presidio and the preservation of its cultural and natural resources. Land use and leasing proposals should not drive the direction of the overall plan. The value of the Presidio to future generations of this nation is that it is, no matter the management structure, a national park.

This letter outlines the National Park Service's highest priorities for the Presidio – priorities that we strongly believe should be incorporated into the final PTIP. We believe that by adhering to these priorities, the original vision for the entire Presidio will be realized and this spectacular resource will be preserved in a manner befitting its national park status. These priorities are:

Ensure the Integrity of the National Historic Landmark District. Demolition of historic buildings and new infill construction in historic areas including the Main Post, Crissy Field, Fort Scott and the Letterman complex could result in a loss of the historic integrity of the Presidio. The NHLD is the primary reason the Presidio was designated as part of the national park system. As a result, infill actions must be carefully planned and only pursued when they achieve goals central to the Presidio's national park values, such as open space expansion, and do not negatively impact the park's historic landmark status.

Preserve and Enhance Key Natural Resources and Open Space. A central value of the Presidio is its role as an urban oasis. Valuable native habitats, impressive open spaces and exceptional scenery contribute to the Presidio's importance as a national park. While the NPS recognizes that Presidio Trust is committed to ensuring that the Presidio remains a natural haven and open space preserve, we suggest special consideration be given to the following:

- *Expanding the Crissy Field Marsh.* Perhaps more than any single action in the Presidio's history, the restoration of the Crissy Field marsh signaled a commitment to environmental values. Now, the long-term health and sustainability of this marsh requires its expansion. While we are pleased that the Trust has agreed to explore opportunities for marsh expansion, the NPS recommends that PTIP commit to its implementation to the extent necessary to ensure ecological health and natural function. We also recommend that areas potentially necessary for marsh expansion be designated a special management zone while expansion opportunities are being explored. Only short-term leasing should be allowed in that zone until future plans for marsh expansion are determined.

- *Restoring the Tennessee Hollow Watershed.* To better plan for the restoration of Tennessee Hollow's complete ecosystem, the NPS recommends the Tennessee Hollow watershed be combined into one new planning district focused on resource stewardship.

- *Early Implementation of the Vegetation Management Plan.* We are pleased with the joint NPS/Trust adoption of the Vegetation Management Plan, including its zone designations, and consider its implementation one of the highest priorities for the Presidio. We encourage early implementation of key components of the plan and support the sensitive consideration that was given to the balance between historic forest and natural habitat restoration.

Strengthen Visitor Activity at the Main Post. The PTIP shifts the majority of cultural and community programs from the Main Post to Crissy Field – calling for museums, lodging, meeting spaces and other visitor services to be developed adjacent to the newly restored area. This realignment limits the visitors' experience of the historic Main Post, which has long been the heart of the Presidio. We recommend that the role of the Main Post as a significant visitor area of the Presidio be strengthened.

Limit Development and Activity at Crissy Field. Crissy Field is the acknowledged "front yard" of the Presidio and the Golden Gate National Parks. Its spectacular open space is the primary visitor draw and public value. Too much adjacent development has the potential to negatively impact Crissy Field's resources and the visitor experience there by concentrating too many activities and people in this corridor. Finally, it may unnecessarily duplicate commercial services located just outside the Presidio's gates.

Reconsider the Housing Policy. The NPS does not support the concept of "no net loss of housing", and urges the Presidio Trust to reconsider its plans to add up to 886 new housing units beyond the level contained in the GMPA. While we understand the value of a workplace and housing balance, we do not support the level of housing needed to achieve this balance at the expense of critical resources. When housing is provided, the strong emphasis should be upon the reuse of historic buildings. New construction in the Presidio should only be considered when no reasonable alternatives exist and when it can be clearly shown that there will be no adverse effects on the cultural or natural resources.

Seek a More Modest and Appropriate Level of Self-Sufficiency. We urge the Presidio Trust to reexamine its financial model and to pursue only those revisions to the GMPA needed to ensure the most fundamental level of self-sufficiency. With this approach, we believe that new development can be more carefully contained. For example, the Presidio Trust's proposal to allocate up to $10 million of its own funding for programming does not appear essential to its mandate; yet this proposal requires corresponding leases and development to generate $10 million annually in net income.

Seek Program Partners. We urge the Presidio Trust to consider more active use of partnerships and to give priority to partnerships that advance the most important interpretive priorities of the Presidio. Additionally, building space should be reserved for these partnership opportunities. The Golden Gate National Parks have a long and successful track record in partner-based public programming. Not only does this approach to programming offset some of the need for federal resources, it inspires community ownership in programs and promotes diversity in sponsors and participants. If the Presidio Trust does pursue programmatic efforts, they should be conducted in strong partnership with the NPS and with tenants and other organizations.

Seek Funding Partners. The Golden Gate National Parks also has been highly successful in applying funding from other federal, state and local agencies to projects and programs as well as garnering volunteer and philanthropic funds through nonprofit partners. We encourage the Presidio Trust to expand its commitment to financial partnerships in order to reduce the need for income generated from new development, in turn, reducing potential adverse impacts to Presidio resources.

Specify Future Public Planning Process. Finally, we encourage the Presidio Trust to commit to a planning process in which the scope and scale of specific development proposals are made clear to allow public and environmental review. As drafted, the PTIP offers categories of actions subject to further review, but does not specify which individual projects and programs would require additional review. This presented a dilemma for the NPS as it reviewed the plan and EIS, and will continue to be of concern to the NPS and the community as the Presidio Trust seeks to move forward with individual components of the PTIP.

As the PTIP is currently written, only the GMPA2000 alternative appears to protect the Presidio's cultural and natural resources; every other alternative has significantly greater adverse effects. Therefore, we recommend that the Trust modify an action alternative to provide a lower potential for effect than those proposed to date, one that avoids significant adverse impacts to key resources and the visitor experience. The attached documents describe our priorities in more detail, as well as offer a number of specific comments and recommendations on the plan and DEIS.

Again, we appreciate the opportunity to provide our comments at this important juncture in the Presidio's future, and we understand the complex challenges of meeting the mandates of park preservation, self-sufficiency and public expectations. We stand ready to move forward with the Presidio Trust to create a shared vision for the future of the Presidio.

Sincerely,

Brian O'Neill
General Superintendent

Attachments:
A. Specific Broad Comments
B. Related NPS Management Policies
C. Specific Comments on the PTIP
D. Specific Comments on the DEIS

ATTACHMENT A – SPECIFIC BROAD COMMENTS

Statement of Goals. The vision statement of the PTIP would benefit from a clear restatement of goals, both for the Trust, and for this planning document. Although the Trust Act directs the Presidio Trust, first and foremost, to protect the Presidio's resources from development while minimizing cost to the United States Treasury, these two equal and essential elements of the Trust Act (Section 101(5) and (7)) are only the foundation for the spectrum of the agency's goals. They provide the basis for the development of a more explicit vision for the Presidio, which would depict the character, appearance and visitor experience that would result from implementation of the plan. As they are also essential agency goals, they should also be readily identifiable throughout the principles and implementation strategies in the PTIP. As an example, the DEIS acknowledges on page 224 that, "In summary, the Draft Plan alternative may have a new adverse impact on the individual historic resources and on the NHLD due to (unspecified) future building demolition, which may exceed demolitions anticipated under the GMPA." The PTIP should make an unqualified commitment to the preservation of the National Historic Landmark District (NHLD) in a vision statement, the PTIP Objectives and Purposes of the DEIS, and the PTIP Planning Principles.

To complete a consistent presentation of the Trust's essential goals, the stated purposes of the PTIP planning effort on page 9 should reflect the equal status that resource protection and minimizing cost hold in the Trust Act, as stated in Section 101 of the Act. The purposes of the PTIP should be restated so that the goal of resource protection is as strongly worded as that of achieving planning flexibility.

Clarification of the Need for the Process. Recent financial analysis has shown that the GMPA-based alternative would meet the Trust's requirements for financial self-sufficiency, even using the conservative financial model employed in the DEIS. Given this, a strongly supported justification of need for the PTIP becomes critical. Qualitative information and quantitative data should be provided in the following areas:

- In the DEIS, the Trust states that a new general plan will provide the means to achieve financial self-sufficiency. Yet the same document also finds that the No Action alternative (the GMPA 2000 alternative) meets the Trust's financial goals with fewer impacts on park resources than the Trust's Preferred Alternative (the Draft Plan) (PTIP DEIS S-24). The DEIS discussion of need should address this inconsistency with the stated goals of the Trust Act noted above.
- NPS data supports no financial loss, and some gain, resulting from the premature departure of the Sixth Army during NPS administration of the Presidio, *vis a vis* the subsequent market rate rents received from the replacement, non-military tenants. The Trust should provide data to support the PTIP contention of financial loss resulting from that same circumstance.
- The Trust should include opportunities to supplement agency income with philanthropic contributions.
- The discussion of need states that additional revenues are needed to compensate for the several long-term leases to non-profit tenants that the Trust inherited from the NPS administration. Because non-profits are not necessarily non-market value tenants, the PTIP should further document this loss of income or remove it as a rationale for need.

The PTIP states that the current plan does not allow sufficient flexibility in the selection of tenants. However, flexibility was demonstrated by the Letterman SEIS which showed that amending the existing plan is a feasible process even when a project exceeds the upper limits set in the adopted plan. The key feature of the GMPA that would be difficult to amend is the upper square footage limit of development. If this is the flexibility that the discussion of need refers to, that discussion should address why the Trust requires a higher upper limit.

Use of a Programmatic Approach. In the NPS planning process, (Management Policies 2.3.1 and 2.3.3), a programmatic document would be developed as a "first cut" at management actions. Its purpose would be: "to ensure that a park has a clearly defined direction for resource protection and visitor use...it will focus on why the park was established and what management prescriptions should be achieved and maintained over time (2.3.1)." The PTIP is presented as a programmatic look at alternatives and impacts (DEIS p.1), however, it also clearly states that many projects will proceed directly to leasing and

implementation after PTIP adoption. This combines a programmatic general plan with authority for implementation of unlimited, and currently unspecified, actions.

Even though the Trust believes a flexible approach to planning is warranted, we suggest that a certain level of specificity must be provided in the EIS analysis. For example, the upper and lower limits of a reasonable range of demolition, new construction, restoration, etc. for each alternative is necessary. Because it is critical to know where impacts will occur, each alternative must include the location of all the potential demolition, construction, and restoration, for each end of this range. This should be possible given the level of information on nearly every aspect of the Presidio's physical, cultural and social setting presented in the DEIS Affected Environment chapter (DEIS p. 71-218).

In order to be able to move directly into actions such as long-term leasing (PTIP p. 134) after the PTIP is adopted, the NPS recommends that the Trust modify the PTIP and DEIS. The modified PTIP document should define agency goals and principles supporting a Presidio-wide vision, outline the subsequent planning processes and provide sufficient detail to allow assessment of impacts to park resources and to discern the character of the planning districts.

Future Public Planning Processes. As directed by the Council on Environmental Quality (CEQ), programmatic documents broadly assessing the affected environment and cumulative effects of a program are to be followed by site-specific or project-specific NEPA documents (CEQ, 40Q, 24). The DEIS does describe a commitment to future, specific plans (page 1) but that commitment is weakened by the text that immediately follows, which provides opportunities for a range of actions that do not require public review:

> "More detailed and site-specific, district-level, and/or issue-oriented plans will be developed in the future based upon the direction established in the final Plan. Some individual projects that are consistent with PTIP could proceed immediately, likely without need of environmental review beyond the PTIP EIS. At this time, it is anticipated that these projects would primarily include (1) cultural programs and special events; (2) long-term leases involving no new construction or demolition of historic resources, where uses are identified as "preferred" within the PTIP planning guidelines; and (3) natural resource restoration efforts that are consistent with both the PTIP and the VMP." (DEIS Page 1).

This section of the PTIP presents the area of greatest concern for the NPS, due to the number of structures that could be made available for immediate long-term lease after the PTIP is adopted. Consider the application of this process to the planning districts of Crissy Field and the Main Post, where "Preferred...uses would include..."(PTIP p. 86 and 92):

> Main Post: cultural/educational, office, lodging, small-scale conference, recreation, residential, supporting retail services, and existing administrative and operational functions.
>
> Crissy Field: museums, visitor and cultural facilities, educational programs, recreation, lodging, cafes, and meeting space.

The terminology "preferred uses include", as opposed to "designated land uses are", allows a potentially wide range of commercial, office and service uses for the Main Post and Crissy Field. In order to proceed to implementation, the DEIS or a subsequent planning process should provide enough information to the public so that the effect of such long-term leases and specific uses on the overall development of the district and park can be judged.

The PTIP and DEIS provide little specific information to the public on the subsequent planning processes referred to in the documents. Thus, it is difficult to determine what future implementation activities have been adequately assessed by the DEIS. The Trust should provide additional clarification to establish the clear threshold for when a public environmental review would be triggered by Trust actions. For example, would the demolition of Baker Beach or Tennessee Hollow non-historic housing, or construction of replacement housing in a non-historic area trigger a subsequent environmental review process? Would

district planning occur before long-term leases are granted or only at a point when new construction or demolition in the district is proposed?

The only firm standard listed for future environmental review is mitigation measure CR-4 which states: "The Trust would complete additional planning prior to implementation of any project proposing demolition or new construction that could result in a new adverse effect on historic resources." According to this measure, new construction or demolition that, by the Trust's own internal assessment, would not result in a new adverse effect on historic resources would not necessarily trigger environmental review. If the intent of the Trust is to complete a public planning process for each demolition and new construction in the Presidio, a mitigation measure describing this commitment should be added to the plan. The Trust should clearly state now which reasonably foreseeable projects, such as known demolition and construction, and which planning processes will proceed directly from the PTIP and present a preliminary schedule for them. To ensure an orderly planning process the NPS recommends that, prior to long-term leasing, the Trust either modify the PTIP as stated above or move directly to district planning.

Preparation of the Comprehensive Management Program. The Trust is required by 16 USC 460bb Section 104(c) to develop a comprehensive program for management of the lands and facilities in Area B. There are four required components of the program:

1) demolition of structures which in the opinion of the Trust, cannot be cost-effectively rehabilitated, and which are identified in the GMPA for demolition,
2) evaluation for possible demolition or replacement those buildings identified as categories 2 through 5 in the Presidio of San Francisco Historic Landmark District Historic American Buildings Survey Report, dated 1985,
3) new construction limited to replacement of existing structures of similar size in existing areas of development, and
4) examination of a full range of reasonable options for carrying out routine administrative and facility management programs.

In the PTIP, the Trust states that the foundation of the comprehensive management program is established in the PTIP but will not be addressed by any single document or plan. The program will consist of a number of documents or plans that incorporate the Trust's on-going management practices, operating procedures, policies and programs. This range of plans, programs and processes, developed over time, would constitute the comprehensive management program. (PTIP p.141)

The crucial requirement of the comprehensive management program is the full evaluation of all possible demolition, particularly of historic structures, and new construction in the park. This evaluation should be completed as part of the PTIP in order to provide an assessment of cumulative effect to the NHLD status and should address both historic structures and cultural landscapes.

Although the 1985 HABS report is required by the Trust Act to evaluate whether the historic structures are economically viable for rehabilitation, the 1993 update of the San Francisco National Historic Landmark District is the base document for determining which historic structures contribute to the NHLD. Use of the update would allow a reasoned, comprehensive assessment of impacts to park resources and would strengthen the Trust's commitment to preservation of the NHLD status.

Range of Alternatives and Level of Development. The NPS suggested in our comments during PTIP scoping (June 4, 2001) that the Trust examine the GMPA and develop an alternative that makes the minimal modifications necessary to the GMPA to allow the Trust the planning flexibility it feels is warranted. The PTIP states that the Preferred Alternative (Draft Plan alternative) represents these minor modifications (PTIP p. 30-31, DEIS p. 16, 407,408). We disagree, and feel that the range of alternatives in the DEIS continues to present unnecessarily high levels of development for the Presidio. The NPS encourages the Trust to modify an alternative to have a level of effect similar to or less than the No Action alternative. This would provide a more reasonable range of alternatives for public consideration.

Descriptions of Alternatives. Although the CEQ allows a separate plan and EIS document, the EIS must be detailed enough to stand on its own; the plan is considered "technical backup" (see 40 Questions, #21). NEPA regulations require that the impacts of alternatives be analyzed in sufficient detail so readers "may evaluate their comparative merits." (40 CFR 1502.14). The level of description of the alternatives in the DEIS is at such a conceptual level that it makes it difficult to compare, or understand, their relative technical, logistical, economic or environmental similarities or differences.

All DEIS alternatives should be described fully, and in equal detail, in order to evaluate their relative ability to achieve the PTIP Planning Principles and the overarching Trust goal of sustainability (PTIP p. 20). The alternatives should describe further the desired future conditions for each planning area, identify the historic structures within each that would be evaluated for possible demolition, provide more specificity on the uses proposed for structures to be leased and identify areas where new construction would likely be sited. These areas should be logically tied to the level of demolition and new construction for each alternative and each planning district. In addition, an explanation should be provided describing the development of the building caps, demolition caps, etc. in Appendix J. Finally, to effectively compare and contrast the PTIP alternatives in a meaningful way, the DEIS Summary should include a table that compares the critical components of each alternative, i.e., the levels of demolition, new construction, overall square footage, etc. The NPS requests that the DEIS discussion of alternatives be revised as described.

Impacts Analysis. We believe that the DEIS does not adequately address potential effects to park resources or the visitor experience and is incorrect in many of the conclusions of the potential for impact. The DEIS should analyze and compare the differences of action alternatives with respect to their consistency with the park purpose and objectives, and compare the quality of visitor experience, impacts on park resources, short- and long-term costs, and environmental consequences that may extend beyond park boundaries, to the No Action alternative.

In summary, the DEIS would benefit from inclusion of the following components:

1) A clear and consistent summary of relative effects of the PTIP alternatives as compared to the GMPA 2000 alternative, with the level of effect described using standard NEPA terminology. The conclusions in the Summary Table should not conflict with the conclusions in the Environmental Consequences chapter.
2) The designation of thresholds above which an impact would be considered as having an adverse effect on the environment. The thresholds should be defined in the methodology section of each issue area. Of the 37 impact topics listed in the Summary Table, thresholds are provided for only 4 topics (wastewater, natural gas, energy conservation, and Trust operations).
3) The DEIS should assess each alternative as to its effectiveness in meeting the stated objectives in the DEIS.
4) The DEIS should discuss and assess the effectiveness of the mitigation measures in avoiding or reducing the level of potential effect. For example, the PTIP Planning Principles and District Guidelines are to be relied on to mitigate impacts to cultural resources (CR-4) but an assessment of the effectiveness of these principles and guidelines is not performed.
5) The DEIS should describe the current range of visitor experiences in the Presidio and assess the changes the visitor could experience from implementation of the PTIP alternatives. The visitor experience is a broader concept than simply the provision of events and programs – the experience involves a range of types, levels and values that range from large scale events to small interpretive programs to the enjoyment of solitude.
6) The NPS is very concerned about potential impacts to lands under our administration. The DEIS should assess the impacts of the PTIP alternatives on Crissy Field within Area A as compared to the No Action alternative (GMPA 2000 alternative). Impacts assessed would include changes to the NHLD integrity, the cultural landscape, the visitor experience, Crissy Marsh expansion, recreational opportunities, parking, overall traffic volumes and background noise levels.

7) The DEIS should include a discussion of methodology used to investigate the potential for effect for each of the 37 impact topics. For example, methodology explaining how conclusions of impact were reached are lacking many impact topics such as historic architectural resources, cultural landscapes, archaeology, water quality, visual resources, visitor experience, parking, bicycle and pedestrian circulation, transit services, construction traffic and storm drainage.
8) The level of detail in the analysis of impacts does not reflect the level of specific information on square footage of new construction, total construction, amendments needed to vegetation management plan zoning, encroachment on native plant communities, etc. that are expressed in the PTIP and DEIS alternatives.
9) DEIS does not assess impacts of PTIP alternatives on Area A, including parking, traffic, cultural resources and visitor experience.

With the broad latitude of possible development allowable in each PTIP planning district under the action alternatives, and the unlimited overall scenarios this could produce, the DEIS in its present form does not provide evidence needed for an effective assessment of impact. The detailed comments in Attachment D to this letter demonstrate many of the above recommendations and correct deficiencies in the DEIS.

The NPS recommends that the DEIS be modified to present a complete assessment of impacts, with firm mitigation standards, that would include, but not be limited to the NHLD, visitor experience, transportation, parking, scenic resources, resources of Area A, and future marsh expansion.

Level of Commitment. The DEIS on page 1 states that "Adoption of the PTIP does not constitute a commitment to any specific development projects, construction schedules, or funding priorities, but instead will establish a policy framework to guide future Trust Actions." However, the PTIP clearly states that, following the adoption of the PTIP, the Trust would proceed to long-term leasing of historic and non-historic structures and other projects. To allow implementation of these "unspecified" Trust actions to be assessed, adequate protections for park resources and the visitor experience must be in place in the PTIP and adopted through the Record of Decision for the document. In place of details of the Plan development, the policies in the PTIP must function as clear agency commitments to assure that if impacts cannot be avoided, actions will not be adopted. For example, commitment to preservation of the NHL status is included in the community assurances and the Planning Principles, but these are not adopted as a commitment or policy by the Trust. In light of the conceptual nature of the PTIP, and the potential for adverse effect to the NHLD, a firm and clear commitment to the preservation of the integrity of the NHLD should be adopted by the Trust through the Record of Decision. This commitment should be expressed as mitigation and as a fundamental element of the PTIP goals, purpose and objectives.

The NPS recommends that the community assurances, Planning Principles, and District Guidelines in the PTIP be assessed to demonstrate to the public the level of effectiveness to be expected in protecting park resources and the visitor experience during PTIP implementation. If not found effective, they should be strengthened, and adopted to become enforceable as mitigation.

Tenant Selection. The PTIP tenant selection criteria are:

1) compatibility with PTIP planning principles and preferred uses articulated in PTIP planning district guidelines;
2) demonstrated ability to fund necessary building improvements and contribute to the Presidio's financial sustainability; and
3) responsiveness to park program themes and contribution to the visitor experience. (PTIP page 140).

Although the Trust Act does state that priority should be given to those tenants that "enhance the financial viability of the Presidio..." (Section 104 (n)), this may make it more difficult to develop a "dynamic community where programs and activities serve, inform and educate visitors from near and far"(PTIP p. iii). Though a financial proposal can be a baseline requirement for tenant suitability, the next level of the selection process should address the contribution of the tenant to the realization of the park vision

through delivery of distinctive programs. This would allow a greater possibility of tenants who would become actively involved in the mission and community of the park, which would in turn allow more interaction between tenants and park visitors. An ultimate result could be greater accessibility to the historic structures, which were the basis for the Presidio being chosen for inclusion in the national park system.

The NPS recommends that the Trust give stronger weight to the programmatic contribution element of the selection criteria and consistently state those criteria throughout the PTIP.

Preservation of the Presidio National Historic Landmark District. The PTIP focuses on the need for flexibility in planning, yet the lack of information provided in the PTIP and DEIS have not allowed a complete assessment of potential effect on the NHLD. Totals of square footage demolished or built in each planning district are presented in the DEIS, but without information as to which buildings contribute to the overall figures, the preservation of the NHLD cannot be assessed. If the NHLD status were lost, this could threaten the continuation of the Presidio as a part of the national park system.

As required in the comprehensive management program (16 USC 460bb §104(c)(1), the Trust must remove buildings identified for demolition in the GMPA unless these structures can be cost-effectively rehabilitated. A second requirement of the comprehensive management program is an evaluation of those structures listed in categories 2 through 5 in the Presidio of San Francisco National Historic Landmark District Historic American Buildings Survey (HABS) that could be considered for demolition. These requirements, and the potential locations of new construction, should be depicted in the PTIP in a Presidio-wide graphic and in the graphics for each planning district. This would constitute disclosure of the full range of possible demolition and construction and allow an assessment of a worst-case scenario given the maximum demolition and construction caps. This is essential for determining the cumulative potential impact on the status of the Presidio as a NHLD.

Mitigation measures CR-1 through CR-4, and CR-7, are proposed to address the potential adverse effect on the NHLD. Mitigation measure CR-4 is the strongest of the five and calls for plans to conform to PTIP Planning Principles, PTIP Planning District Guidelines, and the Secretary of the Interior's Standards, to the maximum extent feasible. However, the DEIS contains no evaluation of the effectiveness of those measures in reducing or avoiding adverse impacts and there has been no separate assessment process that has reviewed the adequacy of the PTIP Planning Principles or Planning District Guidelines in protecting the cultural resources of the district.

In the PTIP "mitigation measures are set up to provide standards, monitoring and other broad requirements that would be applied to future projects" (PTIP DEIS p. 238). Mitigation for cultural resource impacts of a broad programmatic document should set the standard that all new construction and demolition will be proposed in a manner that assures the preservation of the integrity of the NHLD. Those projects that cannot meet this standard will be modified until the standard can be met, or removed from consideration. An example of such a project would be the removal of the Public Health Service Hospital, which the PTIP states would not affect the integrity of the NHL. The integrity of the district would be significantly affected by this action, which would be an unmitigatible adverse effect. Demolition of historic buildings should be considered only as a last resort and only on a case by case basis; this is not a sustainable activity.

The Presidio Trust should adopt a firm and unqualified policy to protect and preserve the NHLD status and demonstrate this commitment through a comprehensive assessment of potential effects that will identify a development scenario that supports the commitment. Also, the cumulative assessment of effect on the NHLD must consider the potential loss of the Presidio of San Francisco NHLD in a state and national context.

Housing. The NPS recommends that the Trust reconsider its new policy of "no net loss of housing" for the Presidio (PTIP p. v). A significant concern for the NPS is that new construction used to satisfy the stated jobs/housing balance would contribute to the level of development that has already been noted as a threat to the NHLD status of the Presidio. This supports our recommendation that the Trust rely on

existing structures to provide any housing that is required as part of the PTIP. Conversion of non-residential buildings to residential, or subdividing large units to smaller ones where compatible with historic preservation guidelines, should be used to meet housing goals. New construction for housing should be considered only as a last resort when reasonable alternatives are lacking, and should be limited to replacement of removed historic structures such as the Letterman Hospital finger wards or other locations not in conflict with natural resource management goals.

The NPS recommends that residential uses at the Presidio be restricted to existing structures, that the Trust must provide housing at a full range of pricing to match the Presidio workforce payscales to support the goal of sustainability, and that housing areas proposed for removal be phased out as soon as financially possible to allow for parkland restoration.

Financial Model. The DEIS financial models of the alternatives appear to unrealistically overstate expenses (e.g. assumption by the Trust of all rehabilitation costs), understate revenues (e.g. overly conservative rent levels and omission of interest income), and in all but two of the alternatives, substantially increase the revenue requirement with a significant expense for programs, which are not mandated by the Trust Act.

The financial assumptions used in the PTIP are overly conservative. For example, the Trust assumes that it must fund all rehabilitation although it is reasonable to assume that private investors may assume some of these costs under a ground lease scenario (e.g. Buildings 38 and 39) which would allow for capture of investment tax credits for historic building rehabilitation. Such conservative assumptions, combined with the understated revenue projections and inflated operating expenses for programs, could potentially influence the level of demolition and new construction to meet the requirement for self-sufficiency. This possible need for new construction threatens the ability of the Trust to meet one of its essential mandates – to preserve the Presidio's cultural and natural resources. Additionally, if the NHL status of the Presidio is lost due to the effect of new construction and loss of contributing structures, so too could the ability to finance historic building rehabilitation through tax credits in the future, and retroactively, threaten tax credits already claimed by third parties for completed rehabilitation.

The Trust should reconstitute the financial models, giving equal treatment to the alternatives in the timing of Wherry housing removal and using appropriate levels of expenses in the GMPA2000 alternative (e.g. non-residential revenue projections, program capital and planning expenses). The NPS recommends that, for each alternative, the Trust factor in the potential for some philanthropic funding for programs and park improvements in the financial models, and include in parkwide expenses a base level of funding for programs, museum collections and natural resource projects such as the native plant nursery and revegetation projects. We further recommend that the models be based on the stated mandates of the Trust Act to conform to the GGNRA enabling legislation, the general objectives of the GMPA and the need to manage the resources of the park.

Programs. The NPS supports the Trust's vision of a "...palette of program opportunities designed to create a compelling park experience for local, national and international visitors." that can be created through partnerships with the NPS, tenants, schools and cultural institutions. (PTIP page 64). The provision of programs through a variety of sources would allow the possibility of significant visitor interaction with tenants, introduction of a broad range of activities and viewpoints, an increase in visitor access to the historic structures, and expression of the concept of "a global center for exchanging ideas on critical environmental and societal challenges." (GMPA p. 24). In comparison, if the Trust relies only on agency generated programs and sources, the programs provided could lack the diversity envisioned in the GMPA, and enthusiastically embraced by the public during that planning process.

The return to a focus on tenants for provision of programs would also address a related NPS concern that the increase in the level of programs envisioned in the PTIP could influence the level of new construction and demolition in the Presidio, in the quest for increased revenues. "Under the PTIP, program quality and quantity would depend on the Trust's ability to generate lease revenue, as well as the extent of philanthropic support received for Trust and National Park Service programs." (PTIP p. 73) But, since the Trust has limited expectation of philanthropic support, it is reasonable to assume that lease revenues will

be the major funding source for programs. The NPS position is that the desire for a specific type and level of programs should not be the rationale for an increased level of development in the Presidio.

The NPS looks forward to working with the Trust to identify a list of specific cultural institution concepts that could be included in the PTIP, that would carry out the essential themes of the Presidio. We believe such a list would serve to enhance the final plan. The NPS supports the continued development of a collaborative approach to interpretive and program services between the Trust and the NPS, emphasizing partnerships and the contributions of the park tenants as an integral part of the effort to develop the spectrum of programs in the Presidio.

Concentration of Visitor Activity. Historically, the Main Post has always been the heart of the Presidio, and under the GMPA, the Main Post was to "remain the center of Presidio community and the focus of activities" (GMPA p. 58). The PTIP has changed that focus to emphasize Crissy Field as the principal location where park visitors would be welcomed inside Presidio structures, primarily museums, hotels, meeting spaces, and cafes, while the Main Post is noted as a "...backdrop for visitor programs and ...a setting for businesses, organizations and Presidio community services." (PTIP p. 85) The GMPA saw the Main Post, not as a backdrop, but as an area where "Much of the interior space...will be devoted to activities that involve the visiting public." (emphasis added) (GMPA p. 61)

The shift of the bulk of cultural and community programs from the Main Post to Crissy Field in the PTIP presents a major change in visitor experience from the current plan. Visitors would be primarily restricted to the exterior areas of the Main Post and drawn to the attractions along Mason Street. This concentration of public use in the narrow corridor along Mason Street would change the existing low-intensity character of the Presidio waterfront, which provides a needed escape from urban pressures that only open space can provide.

NPS urges the Trust to reconsider the focus of visitor activity in Area B, to lessen the impacts on Area A of Crissy Field, and complete a comprehensive Crissy Field Area B district plan prior to committing to long-term leases throughout the district.

Level of Development at Crissy Field. The character and intensity of development proposed by the PTIP south of Mason Street is at odds with the new park experience at Crissy Field in Area A. Crissy Marsh, the restored Crissy (air) Field, the beaches cleared of rubble and wide promenade are the result of years of stewardship, partnership and public planning. The total of 690,000 square feet of buildings south of Mason Street (PTIP p. 95) allowed in the PTIP, 80,000 square feet more than the present level of development and 300,000 square feet more than envisioned in the GMPA (NPS-Presidio Building Data Base), has the potential to change the Presidio's northern waterfront from an area of respite from urban pressures to an extension of the City itself. Additionally, the concentrated and significant level of development in this area alone has the potential to adversely effect the NHLD.

The NPS recommends that the level of development in the Crissy Planning District be significantly lowered from the level in the PTIP and that a district planning effort address this distinct historic area and inform the public as to plans for historic preservation, demolition, new construction, land use, tenant selection, traffic, public access, etc., prior to committing to any long term leases. The NPS also recommends that the Trust consider a development option for Area B of Crissy Field that would not expand the built environment nor duplicate commercial services found just outside the Presidio gates.

Expansion of Crissy Marsh. The NPS supports the Trust's commitment to the value of Crissy Field Marsh. The DEIS discussion of Crissy Field tidal marsh expansion through future site planning and analysis (PTIP p. 32 and NR-10, PTIP DEIS p. 259) should be clarified to note that a feasibility study was completed in 1995 and 1996, and that marsh expansion is feasible. The next step toward realization of this goal should be a Crissy Marsh alternatives assessment to identify where marsh expansion can occur. The NPS and the Trust have initiated discussions to work together on this study.

The PTIP clearly states that the Trust could immediately execute long-term leases for the both historic and non-historic structures on Crissy Field in Area B which could significantly constrain or preclude marsh

expansion in that area. The PTIP must allow for the continued ecosystem health and functionality of the existing marsh by strengthening the commitment expressed in Mitigation Measure NR-10.

The NPS recommends that the areas to be studied for potential marsh expansion, including Tennessee Hollow, be designated and set aside as a special management area within the planning districts. The special management area boundary would be shown in the planning district maps. Only short-term leasing would be allowed within the area until the results of future planning are known.

Tennessee Hollow Planning District. The NPS commends the Presidio Trust's commitment to preservation of the Tennessee Hollow watershed. However, the Tennessee Hollow restoration area is currently split between four planning districts. To better plan for preservation of its complete ecosystem, the Tennessee Hollow watershed should be combined into one resource-based planning district.

Resource Consolidation Concept. The NPS does not consider the near-term removal of the East and West Washington housing a high priority. If the Trust does consider the removal of housing on Washington Blvd., the following factors should be taken into consideration.

1) The East Washington housing was constructed in 1948, and should now be evaluated for possible inclusion as contributing to the NHLD.
2) Buildings should be removed only to restore native habitats or historic forest and maintain trail access on the historic road alignment.
3) The removal of Washington Blvd. housing should not trigger additional new construction.
4) Removal of buildings should give priority to those that will allow restoration of important serpentine grassland habitat and forest zones.
5) The priority of restoration of native habitat in this area should be considered in context of other habitat restoration projects in the Presidio.
6) Traffic impacts of closing Washington Blvd. should be fully evaluated.

Transportation Demand Management. The Transportation Demand Management (TDM) program presented in the PTIP should be more aggressive in its automobile trip reduction goals; in its present form, the program would attract cars at roughly twice the rate of the rest of San Francisco. The NPS recommends that the elements of the TDM Program be more ambitious. Specifically, the NPS suggests that the TDM:

1) Focus on the morning weekday peak period and weekend, midday auto traffic reduction, since key roadways leading to and through the Presidio are already at capacity over an extended morning peak.
2) Develop a transit system that is attractive to potential riders, specifically - provide express transit service connecting the Transbay Terminal, one of the downtown BART stations, and key Golden Gate Transit stops to various key locations in the Presidio and a connection from the Golden Gate Bridge Toll Plaza (or new Doyle Drive intermodal facility) to various points in the Presidio.
3) Maintain direct responsibility for providing good transit rather than passing this along to tenants. Economies of scale suggest that the Trust should take overall responsibility for providing transit, similar to the other Presidio utilities such as water and power.

NPS/Trust Facility Needs. The PTIP should commit to the requirements of a museum collections facility to allow the NPS and Trust to comply with the legal requirements for federal collections in CFR Title 36, Part 79, and other collections requirements. The Trust should identify the size and physical requirements for a candidate structure, alternative buildings under consideration, and possible site locations for a new facility. The PTIP also should clearly identify the other operational facility needs of both the Trust and the NPS, which include buildings, parking and the proposed transit hub.

NPS Area B Responsibilities. Section 102 (b) of the Trust Act states: "The Secretary shall be responsible, in cooperation with the Presidio Trust, for providing public interpretive services, visitor orientation and educational programs on all lands within the Presidio." The PTIP should acknowledge in

he description and analysis of all the alternatives these NPS responsibilities that are required by the Trust Act. The PTIP should clarify the cooperative effort between our agencies relating to these responsibilities.

NPS Visitor Center. The Trust Act specifically placed Building 102 under the management of the NPS to house the William Penn Mott Visitor Center. The NPS has not considered relocating the visitor center from Building 102. Areas of the Presidio under the jurisdiction of the NPS are not under the purview of the PTIP; thus references to moving the visitor center should be deleted.

NPS Management Policies. The Presidio and all other national parks are held in trust for the people of the United States. The status of the Presidio as a national park creates a public expectation for a higher level of planning, preservation and provision for public access than that of other public lands. Specific directives are codified in the NPS's Management Policies, which are framed by the intent of protecting resources against impairment that could result from changes in land use or development. NPS has been directed to scrutinize actions within or affecting the national parks to maintain this standard of protection and urges the Trust to also assume this public responsibility and prevent the impairment of national park resources. The NPS encourages the Presidio Trust to adopt NPS management policies and enable our agencies to join in a united and complementary approach to managing a national park.

ATTACHMENT B. MANAGEMENT POLICIES

The status of the Presidio as a national park creates public expectation for consistency with the NPS Management Policies. A review of NPS Management Policies indicates several areas of inconsistency with those policies, as noted below.

Cultural Resource Management

Section 1.4.5: "The impairment that is prohibited by the Organic Act and the General Authorities Act is an impact that, in the professional judgement of the responsible NPS manger, would harm the integrity of park resources or values. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- *Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;*
- *Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or*
- *Identified as a goal in the park's general management plan or other relevant NPS planning documents."*

Section 5.2 – Planning. "Planning decisions will follow analysis of how proposals might affect the values that make resources significant, and the consideration of alternatives that might avoid or mitigate potential adverse effects. Planning will always seek to avoid harm to cultural resources, and consider the values of traditionally associated groups. To ensure that approaches and alternatives for resource preservation have been identified and considered, planning processes that could affect cultural resources must include cultural resource specialists, traditionally associated peoples..."

Section 5.3.5.4.7-Use of Historic Structures – "NHPA also requires each agency to implement alternatives to the adaptive use of historic properties it owns, if that will help ensure the properties' preservation. Therefore, compatible uses for structures will be found whenever possible."

Section 9.1.1.3-Protection of Cultural Values – "When important cultural resources are present, efforts will be made to utilize existing contributing structures."

Section 9.1.1.4 -Adaptive Use – " The National Historic Preservation Act and Executive Order 13006 require that each federal agency – prior to acquiring, constructing or leasing buildings – to use, to the maximum extent feasible, historic properties available to it, whenever operationally appropriate and economically prudent (16 USC 470h-2(a)(1))...Even when the cost of adaptive use is greater than new construction, it may still be justified."

The Presidio of San Francisco has been evaluated as required and it has been determined to be nationally significant. It was designated a National Historic Landmark in 1966 and the nomination was updated in October 1993. The update contains an extensive inventory of contributing and non-contributing resources. Since the PTIP has not identified the cultural resources to be removed or affected, the impact of the plan on the National Historic Landmark District (NHLD) cannot be adequately evaluated. The cumulative effect of boundary erosion or the continued removal of contributing structures could each constitute an unmitigatible adverse effect on the NHLD.

NPS, as well as other federal agencies, is required to make every effort to use existing contributing structures rather than propose new construction. If new construction is to be considered, it cannot be an intrusion on significant cultural or natural resources. The PTIP does not clearly state whether all historic structures have been adequately used to ensure their preservation nor does the plan provide information on the location of new construction to determine whether it will affect either natural or cultural resources.

In addition, the PTIP calls for completing the study of economic feasibility of rehabilitation based on the 1985 HABS report. Rather than reuse historic structures, the Presidio Trust is assuming removal of structures that don't meet their undisclosed financial feasibility criteria and using the square footage to construct new structures.

If there is the possibility of impairment, it is the policy of the NPS to "...take appropriate action, to the extent possible within the Service's authorities and available resources, to eliminate the impairment." The PTIP does not use planning to avoid the effects on the National Historic Landmark District. When considering general plans or a proposed project, the NPS must evaluate the action under NEPA and make a specific determination in writing stating that, "the activity will not lead to an impairment of park resources and values. If there would be an impairment, the action may not be approved."

Finally, traditionally associated peoples must be consulted during the planning process to ensure that their values are considered during the planning process. The NPS encourages full and ongoing consultation with the Ohlone people as part of the continuing PTIP planning process.

Natural Resource Management

> *Section 4.4.1. General Principles for Managing Biological Resources - "The National Park Service will maintain as parts of the natural ecosystems of parks all native plants and animals...The Service will achieve this maintenance by: minimizing human impacts on native plants, animals, populations, communities, and ecosystems, and the processes that sustain them."*

There are two proposed changes to the GMPA in the Public Health Services Hospital District (PHSH) with respect to land use zoning that would have important, detrimental impacts to natural resources (PTIP p. 113).

1) The parking area north of the PHSH is changed from a native habitat restoration area to landscape vegetation.
2) The Nike Missile swale is changed from native habitat restoration area to institutional/residential use.

In the DEIS, the impacts of these changes are well documented: page S-13, "a greater potential for disrupting wildlife movement particularly in the PHSH Planning District." ; page 254, "Possible effects on these resources could include increased threat of invasive non-native plant species, and the introduction of structures that would obstruct wind fetch from Baker Beach (necessary for viable San Francisco lessingia habitat), as well as potential reduction in annual plant species richness and available habitat for San Francisco lessingia."; page 262 , "effects could include a change in the existing hydrology of this existing wetland". This lost opportunity for planned expansion of wetlands and habitat for an endangered species is a serious concern to the National Park Service.

> *Section 4.6.5 "When natural wetland characteristics or functions have been degraded or lost due to previous or on-going human actions, the Service will, to the extent practicable, restore them to predisturbance conditions."*

> *Section 4.6.6 "The Service will manage watersheds as complete hydrologic systems..."*

During the PTIP planning process, the NPS requested that the Trust identify and protect from development an expansion area for the Crissy Marsh sufficient to ensure a fully functioning natural system, and provide a clear commitment that the Tennessee Hollow riparian corridors and the Crissy Marsh system will be planned comprehensively and restored as a complete, connected and functional natural ecosystem. These are goals that are consistent with the PTIP Planning Principles # 1 and 3. The PTIP does not include this clear commitment, and could allow long term leases of existing structures, or other uses, to significantly constrain marsh expansion.

The PTIP does not provide an analysis of increase or decrease in stormwater runoff, volume, and quality concerns, to adequately ensure protection of Area A.

While open space may appear to increase under the proposed plan, the intensity of development throughout area B will have overall watershed effects that need to be addressed to protect park resources and values.

Interpretation Management Policies

> *Section 8.2, "...The Service is committed to providing appropriate, high quality opportunities ...that (are) open, inviting, and accessible to every segment of American society."*

Should the ultimate mix of tenants contain a predominance of private business tenants, this could have the effect of making the Presidio less open, inviting and accessible to the general public.

Visitor Carrying Capacity

> *Section 8.2.1: The general management planning process will determine the desired resource and visitor experience conditions that are the foundation for carrying capacity analysis and decision making.*

The DEIS should more completely analyze the impact of significantly increased visitation envisioned in the alternatives. From the 3.7 million visitors of the GMPA, the level of recreational visitation in the alternatives goes as high as 8.4 million visitors per year (DEIS p. S-18). Since annual visitation for all of San Francisco is 17.3 million, these numbers imply a level of use in the Presidio that would have a noticeable effect on the desired resource and visitor experience conditions, altering the quality of respite for which a national park, adjacent to an urban area, would be valued.

Visitor Facilities

> *Section 9.3.2: In general, they should be provided only when the private sector or other public agencies cannot adequately provide them in the park vicinity. However, in-park facilities or services may be justified ... when leaving the park to obtain incidental services would substantially detract from the quality of the visitor experience.*
>
> *Section 9.3.1.7 ...Permanent facilities may be built specifically for cultural activities only when all of the following criteria are met:*
> - *The permanent facility is required for programs of major importance in conveying the park story;*
> - *It would be impossible or impractical to use demountable or temporary facilities;*
> - *It would be impossible to adaptively use other park facilities;*
> - *Neither the facility nor its operation would impair cultural or natural resources, or hinder the use of the park for its intended purpose; and*
> - *It would not be feasible for others outside the park to provide the facility.*

The consideration of cultural programs is an important element of the effort to bring the Presidio alive, however, the addition of new construction to meet these needs should be carefully weighed against the preservation of the important resources of the Presidio, both natural and cultural. A final consideration would be the clear connection of any proposed facilities to the mission of the park.

ATTACHMENT C
SPECIFIC COMMENTS ON THE
PRESIDIO TRUST IMPLEMENTATION PLAN (PTIP)
NATIONAL PARK SERVICE
OCTOBER 25, 2001

No.	PTIP Page Reference	Comment
1.	ii	Paragraph 3. "To complement the diverse tenants on the site, the PTIP allows for one or more museums located at a site (or sites) to be determined, possibly occupying or replacing an existing large structure". A list of existing large structures at the Presidio that are candidates for this use should included as well as a map of the areas of development which are suited for the construction of a museum.
2.	vi	Figure I, Planning Districts, Existing Areas of Development and Proposed Open Space should be revised to correctly show existing areas of development. • Certain existing areas of development are proposed for conversion to open space but the map does not show that conversion. It would be helpful if that information was presented on two maps or the area of overlap shown as hatched with both colors designating the shift from current area of development to future open space. (For example, Wherry Housing is an existing area of development that will become open space.) • There are several errors in the designation of areas of development. For example, the area south of the stables is currently not developed but is depicted as such in Figure I. Additional errors are found north of the PHSH, in the drainage at Infantry Terrace, several areas in Fort Scott, and East Housing/Tennessee Hollow.
3.	vii	Paragraph 7. South Hills. "This change would allow restoration of natural resources with enhancement of visitor access and recreational opportunities." Define recreational opportunities and the relationship to restoration of natural resources.
4.	vii	Paragraph 6. "Some infill housing may be integrated." Explain the meaning of 'infill' in this context.
5.	viii	Paragraph 2. The discussion of programs should refer to the Presidio Interpretive Plan being developed in cooperation with the NPS.
6.	x	Paragraph 1. Clarify at what point the requirement for a public process would be triggered if a historic structure to be rehabilitated also required a newly constructed addition (i.e. percentage increase in the building footprint). An example would be a proposal to add an addition to the Presidio Theater.
7.	xi	Table. Rehabilitation and Leasing. The table and the text throughout the PTIP should acknowledge that certain long-term leasing projects should require a separate NEPA and public review process because long-term leases could have significant effects on traffic, land use, visitor experience, effects on Area A that are not assessed in the PTIP EIS.
8.	xi	Table. Major Projects. The West Crissy Field Rehabilitation and Reuse is listed as a project rather than a Major Planning Effort that would be expected of area-wide planning. West Crissy and East Crissy both require a planning stage prior to implementation actions, including long term leasing.
9.	2	Paragraph 3. Please replace text. The Trust and the NPS met regularly but discussions with the NPS focused on review of the planning principles and the graphics depicting the draft alternatives.
10.	8	Under the Trust Act, "removal and/or replacement of some structures within the Presidio must be considered as a management option in the administration of the Presidio;" It is important that the Trust ensure that future projects conform to the Secretary of the Interior's Standards and preserve the integrity of the NHLD. The PTIP lacks sufficient information on how decisions for new construction and demolition will be made. The final PTIP should clarify the decision making process for demolition of historic buildings and for new construction within historic areas.

No.	PTIP Page Reference	Comment
11.	9	Paragraph 3. The Purpose discussion should include a commitment to the preservation of the NHL status and to the value of the Presidio as a national park.
12.	9	Paragraph 1: "PTIP retains elements of the GMPA that have already been carried out or do not warrant change." Specify what these elements are.
13.	13	General Objectives of the GMPA - " The Trust Act directs the Presidio Trust to manage the property under its jurisdiction in accordance with (1) the purposes of the Act establishing the GGNRA, and (2) the "General Objectives" of the GMPA. The General Objectives set forth in Presidio Trust Board Resolution 99-11 dated March 4, 1999 are:" The section outlining the Trust Act directives should be corrected to read, "..and (2) the general objectives of the GMPA. ". It should also clarify that the General Objectives adopted by the Presidio Trust Board Resolution 99-11 are a summary of the GMPA and are not drawn verbatim from it.
14.	14	Paragraph 4. Areas in Fort Scott, Crissy Field, Main Post and Letterman where new construction could be sited should be identified.
15.	14	Paragraph 1. The discussion of Trust programs should make reference to the NPS and the Trust roles assigned by the Trust Act.
16.	21	Paragraph 1: "The Presidio Trust would lead stewardship efforts to preserve the Presidio's uniqueness by preserving and enhancing its diverse and rich natural resources." Change "lead" to "collaborate on". NPS is already stewarding natural and historic areas throughout both Areas A and B of the Presidio. Duplication of stewardship efforts should be actively avoided.
17.	21 22	Principle 1: restoration of natural processes and functions is qualified by notation in two places that restoration efforts would be accomplished "where feasible". Clarify the constraints that support this statement.
18.	22 23 26 28	Resource Maps: • The Trust should identify any areas of the adopted VMP map that are proposed for amendment under the PTIP. • Include a map of areas of existing plant and wildlife values, future restoration sites, and corridor linkages with expository text to support the planing principle to protect and enhance plant and wildlife habitat and enhancing wildlife corridors. • Page 26, Paragraph 5. Include a map of wetland features to support the commitment of no loss of existing wetland features. • Page 28, Paragraph 5. Include a map of the historic structures that are being considered for demolition.
19.	25	Principle 3 should protect all native geologic and soil resources at the Presidio, not just those associated with ecosystems.
20.	25	Paragraph 3. This paragraph describing projects for water resources should be updated to describe the Crissy Marsh Alternatives Assessment.
21.	25	Paragraph 5. A subheading for the Crissy Marsh should be added before Creeks and Drainages, describing principles for protecting and expanding Crissy Marsh to support the goal of sustainability through natural processes.
22.	25	Paragraph 6. The principles for Tennessee Hollow and Crissy Marsh connectivity should address objectives for the Doyle Drive planning process.
23.	26	Paragraph 5. The PTIP should link Mountain Lake restoration with the principles stated in prior pages (e.g., pages 23 "maintaining wildlife corridors") and lay out the watershed scale protection/restoration actions that would make the Mountain Lake restoration project sustainable. These include protection of water quality from Park Presidio Blvd. (cooperative effort with Caltrans) and golf course runoff/infiltration, possible expansion of natural area into golf course and east arm, and long-range corridor planning (e.g., linking with Lobos Creek riparian area).
24.	26 177	Paragraph 2 and 8 respectively. The Water Quality and Water Conservation discussion (p. 56) should address protection of the water quality in the Lobos Creek watershed. The principles should support surface and groundwater quality protection of the watershed that includes the most innovative integrated pest management and fertilizing practices for the golf course.

No.	PTIP Page Reference	Comment
25.	26	Since the enhancement plan for Mountain Lake focuses within the footprint of the lake, it would be appropriate to use PTIP to lay out the watershed scale protection/restoration actions that would make the Mountain Lake restoration project sustainable. These include protection of water quality from Park Presidio Boulevard (cooperative effort with Caltrans), golf course runoff/infiltration, possible expansion of habitat restoration into an adjacent section of the golf course and the east arm of Mountain Lake, and long-range corridor planning (e.g., linking with Lobos Creek riparian area). In addition, linking Mountain Lake restoration with the principles stated in prior pages (e.g., pages 23 "maintaining wildlife corridors") appears appropriate as well.
26.	27	Paragraph 3. The PTIP should explicitly outline the approval process for the new construction in historic areas.
27.	27 28	Paragraphs 2 and 4 respectively. The PTIP should clearly state what guidance will be provided to ensure that the landscaping around the historic buildings is clearly researched and understood. PTIP should clearly state that landscape development around historic structures will be a part of the project development process and should also be consistent with the VMP.
28.	28	Paragraph 5. In addition to discussion of the Trust Act and the HABS 1985 Survey, the PTIP should state that the more recent survey, the 1992 NHL update, will be used in place the HABS 1985 survey as the basis for impact assessment and with for PTIP and NHPA compliance.
29.	28	Paragraph 4. "Through future planning process... the Presidio Trust would evaluate historic buildings for retention or demolition." This section should include an explanation of the future planning process through the NHPA and NEPA and opportunity for public/agency review.
30.	29	Paragraph 6. Explain in the text the relevant sections of the NHPA and the Trust's NHPA responsibilities.
31.	29	Paragraph 1. "The Trust would ensure a full public review and participation program in any proposed projects with the potential for adversely effecting historic resources." Clarify that this is a legal requirement under the NHPA.
32.	29	Paragraph 4. The Trust must comply with Section 110, which addresses reuse of historic structures by federal agencies, as well as Section 106.
33.	29	Paragraph 3. "...the Trust may demolish several smaller buildings in order to aggregate square footage to build or expand larger buildings." Clarify how this proposal conforms to the Trust Act language requiring that "new construction is limited to replacement of existing structures of similar size." The text should clarify that the construction of substantially larger buildings may have an adverse effect upon the character of the NHL and would require NHPA conformance.
34.	31	Paragraph 1. Change the reference "Secretary of the Interior's Standards for museum collections" to the "Department of Interior's Property Management Regulations" (IPMR) (410 Departmental Manual 115-60), and Departmental Manual Part 411 "Museum Property Management" Chapters 1 – 3, based upon the NPS Museum Handbook, Parts I, II, III). This manual is for DOI bureaus.
35.	32	Paragraph 2. Replace the statement," The Presidio Trust in cooperation with the NPS is creating a Scope of Collections document..." with the following "GGNRA has a current Scope of Collection Statement (SOCS) which has been submitted to the Presidio Trust." Currently, the NPS acquires, catalogs, and displays the collections. Please clarify whether the Trust plans to establish its own collection and collecting policy.
36.	32	Paragraph 3. Correct the text to indicate that 36 CFR Part 79 can only direct the collection of federal archaeological materials and does not address the broad variety of museum objects, specimens, and collections that make up the museum collections.
37.	32	Paragraph 4. Change the reference to the "Secretary of Interior's Standards for Curation" to the "Interior Property Management Regulations (IPMR) (410 Departmental Manual 115-60) Departmental Manual Part 411 "Museum Property Management," Chapters 1 – 3. Also, correct the text as follows: "Significant material discovered during construction and excavation work will be accessioned and cataloged into the GOGA collection."
38.	32	Paragraph 5. The NPS recommends that the Trust not make the checklist that evaluates conditions of its museum collections public as it includes important information about security.
39.	33	Principle 9, Open Space Expansion, should address the recreational uses of open space only and show compatibility with ecosystem

No.	PTIP Page Reference	Comment
		and wildlife values. The NPS supports the Trust commitment to expand open space but the quality of the open space should be defined by broad type to distinguish native plant community from landscaped open space (i.e. athletic fields, golf course). The PTIP should locate the proposed expansions of open space by these broad category types and explain their contribution to the park values.
40.	33	Paragraph 3. Add a category of "recreational areas" to clarify the intended land use patterns. There is confusion between the definition of "open space" which does not include "landscaping" as used in PTIP, and the proposal to use VMP categories, including "landscaped areas" as a management tool. In particular, the inclusion of the golf course in this definition, which is an intensively managed landscape, contrasts markedly with the other land uses described (natural habitat, forest, wetlands, etc.)
41.	35 36	Paragraph 6 and Paragraph 2, respectively: Protection and restoration of air quality, natural lightscape, odorscape and soundscape should apply to the entire Presidio and not just to "open space".
42.	37	Paragraph 2. The development of new ball fields, or group camping areas should be assessed on a Presidio-wide basis.
43.	46	Add to overall transportation goals for PTIP: • Trust should give serious consideration to one way routes such as vehicle loops for traffic moving through and around the Presidio. • Cars should be confined to main routes with spur routes to minor locations such as parking areas. • The many roads on the Presidio should not all be available to cars; many should be closed to auto use permanently. • Weekend closures of low volume roads should be established. • Tenants need to include trail planning as part of their overall development, an example being the trail connection to the Exploratorium.
44.	46	Principle 17. Multi-Modal Transportation Options. Include car pools and van pools in transportation options. Include a complete list and clarification of transportation goals.
45.	46	Paragraph 6. Traffic Management. Setting speed limits arbitrarily low will cause consistent enforcement and legal issues. Discuss control of speed through roadway design instead.
46.	47	Paragraph 4. Broaden discussion of TDM goals to include impacts on GGNRA, Presidio Trust and City of San Francisco if these goals are not met.
47.	52	Paragraph 4. Enlarge the discussion on limiting parking either by location or overall supply to include a proposed timetable of how, when and where these changes will be implemented.
48.	56	Paragraph 3. Revise section on "Sources of Reclaimed Water". It describes sources of water and potential uses of reclaimed water, not sources of reclaimed water. Include Crissy Field (Area A) as a potential user of reclaimed water for irrigation.
49.	56	Paragraph 2. Include a conservation implementation plan (including water conservation goals), timeline for action, and a yardstick for assessing progress in attaining water use and conservation goals.
50.	58 59	Principle 25. Environmental Remediation: Include appropriate erosion control and revegetation treatments, consistent with the Vegetation Management Plan, as integral components of any remediation activity.
51.	65	Paragraph 4. The PTIP should include a commitment to continuing sites and buildings that host Presidio NPS interpretive and stewardship programs into the future.
52.	66	Paragraph 2. Give the current status of the PIP and the relationship of the PIP to the Interpretive Themes in the PTIP.
53.	68	Paragraph 6. Clarify if the described Bay Area Museum and Resource Center is different from the proposal for a collections facility. Delete the word "additional".
54.	68	Paragraph 2. A focus for the educational partnership or institute for Fort Scott should be added, with a description of the goals of the institute.
55.	68	Paragraph 1. Describe the process that will decide which museums or institutions will offer a "uniquely western perspective on the American experience". .

No.	PTIP Page Reference	Comment
56.	73	Paragraph 2. The Nursery should be an operating cost rather than a park program.
57.	74	Table 3.1: • Table should also estimate the income generated and referred to in the text of this same page for programs such as the teleconferencing center, traveling exhibits, special event rentals and restaurants. • The figure mentioned for the "Park Museum Management and Collections Fund" is the estimate for the rehabilitation of the Commissary (PE-0610) and Machine Shop (PE-0924). An annual operating figure should be added to the base funding list. • The Nursery should be an operating cost rather than a park program • Clarify why the Trust would assume funding of major museums at $25 to $45 million each when this is not part of the essential Trust mandate.
58.	74	Table 3.1. Clarify the assumption that the Fort Scott Institute would be funded by the Trust.
59.	77 98 99	The need for wildlife habitat corridors that span the Presidio should be addressed in the context of Planning Districts. Guidelines. Identify habitat corridors in guidelines, particularly through Tennessee Hollow and on the northern bluffs.
60.	78	Paragraph 2. "Housing would not be removed until and unless replacement housing is provided via conversion of existing buildings or new construction in other areas of the park." The PTIP should frame this as a firm commitment to not construct replacement housing until existing housing is removed, to avoid the potential to forego removal.
61.	81	Table 4.1. Letterman planning area should identify residential as a use.
62.	81	Table 4.1 should show the demolition and total new construction as well. The text should clarify whether demolition or construction square footage foregone in one district can be transferred to another.
63.	83	Paragraph 1. Main Post – Identify which structures could be available for the park visitor and community related activities around the parade ground. Include a discussion of limitation on office use if leasing proceeded planning.
64.	84	Paragraph 1. Main Post. Include description of which non-historic and HABS structures could be removed.
65.	84	Paragraph 1. The quote from page 58 of the GMPA has been improperly altered from the original text. Deleted without notation from the end of the third sentence is: "...directed at increasing understanding of diverse cultures, and facilitating peaceful dispute resolution." The final sentence of the quote is from page 59, not 58, of the GMPA.
66.	84 85	Paragraph 6. The quote from page 61 of the GMPA has been altered from the original text. Deleted without notation from the first sentence is the word "interior". The corrected quote should read: Much of the interior space at the Main Post will be devoted to activities that involve the visiting public."
67.	85	Paragraph 2. The quote from page 60 of the GMPA should indicate by three dots that two intervening sentences, describing a restored residence and living history experience on Funston Avenue, were left out of the text.
68.	87	Figure 4.4: • The graphic should show which historic buildings could potentially be demolished. The text should discuss the disposition of Building #34. • Figure 1 (page vi) should be corrected to conform to Figure 4-4 at the riparian area north of Infantry Terrace. This area is shown on Figure 1 as an area of existing development. • The graphic legend of 4-4 does not include the VMP mapping designations. Neither the text nor the graphic explains the proposed zoning or land use for green area extending north from the post office to Mason Street. • The graphic should indicate the area of the northern Main Post, near Crissy Field, where the transit hub could be established. • The sliver of the forest just northwest of Infantry Terrace should be included in the South Hills planning area instead of the Main Post. • The area east of the Halleck Street warehouses should be changed from an area of development to one of the vegetated

No.	PTIP Page Reference	Comment
		• The sliver of the forest just northwest of Infantry Terrace should be included in the South Hills planning area instead of the Main Post. • The area east of the Halleck Street warehouses should be changed from an area of development to one of the vegetated zonings. This area is currently not developed, has no vehicle access and could be included into the Tennessee Hollow Riparian Corridor. • Clarify the vegetation type within the Infantry Terrace loop.
69.	87	Paragraph 2. Confirm in the FEIS whether underground parking is part of the PTIP. If it is not, adequate parking for the uses proposed needs to be estimated and locations identified.
70.	87 102	Figure 4.4 and Figure 4.8 respectively. Tennessee Hollow, now shown within four planning districts should be designated as its own resource-based planning district.
71.	91	Paragraph 1. The PTIP should specifically address and identify historic streets and their associated features to assure that the development of the transportation network and possible closings does not adversely affect these contributing features in the NHL District. There is discussion of street redundancy in the guidelines, but the historic streets and their associated features have not been identified to understand what the impact of the removal/closure of historic streets would be.
72.	93	Paragraph 3. The text cited from the GMPA should include the last four words of the final sentence so that it reads, "The area's important cultural, natural and recreational resources will be managed to maximize compatibility among uses while ensuring their preservation."
73.	95	Figure 4.6. • Identify the proposed uses for the green area between the PX and the Commissary. • Clarify whether this coloration relates to the possible expansion of Crissy Marsh? • Figure 1 (Page vi) Area of Development should be amended to conform to the zoning in the area south of the stables. • Indicate on Figure 4.6 which buildings are on the HABS 1985 2 through 5 category. • Indicate which areas could be used for lodging. • Clarify the coding of landscape and native plant areas along the slopes of the bluff.
74.	96	Paragraph 2. Identify the planning process that would address the proposed extension of the main post parade ground across Doyle Drive. Clarify where parking would be provided for all the new uses proposed for Crissy Field and how the additional traffic would impact Mason Street. .
75.	98	Paragraph 6. The PTIP process should assume that a district-wide archeological survey would be completed for Crissy Field in time to inform planning for future projects.
76.	99	Paragraph 3. Expand the bullet regarding Doyle Drive guidelines to include the goal of preserving habitat corridors and maintaining hydrologic connectivity.
77.	102	Figure 4-8: • Indicate which historic structures are planned for demolition. • Indicate areas intended for residences. • On pages 87and 102, explain why the planning district boundaries don't conform to existing physical boundaries, i.e. the intersection of Lincoln and Presidio between the Main Post and the Letterman planning districts.
78.	105	Paragraph 3. The Letterman Courtyard parking lot is proposed for restoration. Include in this discussion the need to provide parking for the Letterman Complex and the capacity of the Lucas garage.
79.	107 111	Paragraphs 3 and 2 respectively. The PTIP should add the commitment to the preservation of the historic military landscape features such as the batteries to the Planning Principles and guidelines.

No.	PTIP Page Reference	Comment
		Specifically, Battery Howe-Wagener, Battery Stotsenberg McKinnon, and the batteries facing the bay (Sherwood, Blaney, Baldwin), including the central magazine and radio station, should be used only for interpretation and cultural management. They should not be adaptively redesigned for other uses. New buildings or structures should not be built in their immediate vicinity to protect their site integrity.
80.	109	Figure 4.10: • At the northwest corner of Fort Scott (just below Doyle Drive), the Area of Development extends into existing wetland features and should be corrected. The aerial photo on page 108 clearly shows this whole section of Fort Scott to be currently vegetated and therefore not a current area of development. • Show which of the structures in this district, both historic and non-historic, could potentially be demolished. • Since structures in this planning district could be 30 to 45 feet tall, the district map should identify the likely locations for new construction.
81.	111	Paragraph 8. Please specify the potential relocation areas for the ballfields removed from the north end of the parade ground.
82.	113	The Public Health Services Hospital Planning District should be changed so that the boundary includes only the already developed area around the hospital and the streets to the east of the hospital. We support the Trust's identification of the important natural and recreational values of the South Hills Planning District, and suggest that this district be expanded to include the natural areas currently in the Public Health Services Hospital Planning District. This is in keeping with the overall principle within the PTIP planning process to concentrate development in developed areas and to create large contiguous open space areas to promote natural resource values. The proposal to amend the VMP designation in the area proposed as a 'landscape' designated zone at the PHSH parking area, and 'Residential / Institutional' zone at the Nike Missile site, would violate the mitigation measures in the PTIP DEIS on restoration of native plant communities (DEIS pg. 257, mitigation NR-5) and protection of wetlands (DEIS pg. 266, mitigation NR-17). In particular, given that the hydrology and plant distribution of the PHSH parking area indicate that much if not all of the parking area would support the natural expansion of the existing wetland that surrounds the north and east sides of the parking lot, it would be impossible to maintain an 100' buffer around native plant assemblages and wetlands from "intensive human activities" (NR-5 and NR-17). It should be noted that a 100' buffer is not a particularly large buffer for planning around wetlands, and an even larger buffer could be considered appropriate in a national park setting. NPS recommends that this and all future VMP amendments be assessed for potential impacts Presidio-wide and that removal for native plant community acreage require a minimum of a one-to-one replacement of similar resource value.
83.	115	Figure 4-. 12. The graphic and the text should describe the proposed amendment to the VMP zoning in this planning district.
84.	118	Paragraph 4. Explain the techniques to be used to discourage through traffic from 14th and 15th Avenues.
85.	121	Figure 4-. 14. Two different shapes are shown in Figure 4-14 and Figure 4-16 for the Area of Existing Development east of Quarry Road. Clarify which one is being proposed.
86.	123	Paragraph 4. Maximum height of new structures is 25 to 35 feet. Include in this discussion the current height of the existing structures by neighborhood.
87.	124	Paragraph 1, last sentence. Delete "where feasible".
88.	129	Figure 4-. 16. The figure shows areas of future development, not existing development as it is labeled. The figure should be amended to include a joint category to show open space and existing development.
89.	137	Table 5-2. Long-term leasing should not occur concurrent with district planning since that would preclude full consideration by decision makers and the public of the potential uses and resources of an area.

ATTACHMENT D
SPECIFIC COMMENTS ON THE
DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) FOR THE PRESIDIO TRUST IMPLEMENTATION PLAN (PTIP)
NATIONAL PARK SERVICE
OCTOBER 25, 2001

No.	DEIS Page Reference	Comment
1.	General	Throughout the document, where project components or mitigations describing a Trust commitment are qualified by the term "if feasible", the constraints that are behind the need to qualify a commitment should be clearly explained. Is this a logistic, economic, technical consideration? What criteria will the Trust use to determine feasibility?
2.	General	For purposes of a National Environmental Policy Act (NEPA) analysis, the designation of the GMPA 2000 Alternative as the No Action Alternative should be consistently presented. Similarly, the Draft Plan Alternative should be presented to the public as the Preferred Alternative and this should also be consistent through the document.
3.	General	Each action alternatives appears to have a greater adverse effect on the environment than the No Action Alternative (for example, adverse effects to the NHLD and cultural landscapes, native plant communities, wildlife, special status plants, water resources, visual impacts, air pollutants, traffic-generated noise, traffic levels, stormwater runoff, native plant communities). Based on the DEIS analysis, the Trust should reconsider the range of reasonable alternatives and modify an alternative to produce one with a lower potential for effect, either similar to or less, than the No Action Alternative.
4.	General	Analyses based on square footages are commonly employed throughout the EIS as the basis on which to predict impacts. But the number of square feet the Trust builds or demolishes may have no relationship or a minor relationship to impacts on any natural or cultural resource. Wildlife, native plants, water resources, archeological resources and many more are all only affected if the activity is in the location of their habitat or the resource itself. An alternative could result in many more square feet of construction, but have fewer or less severe impacts to one or more resources by virtue of *where* that construction takes place.
5.	General	CEQ states that impacts should be "discussed in proportion to their significance." (40CFR§1502.2b). The DEIS rightly contains a substantial amount of description and assessment to Traffic impacts, admittedly an important potential effect of the PTIP. Thirty-three intersections are studied to determine their present levels of service and potential effects. The NPS feels strongly that the impacts to cultural and natural resources are of equivalent importance to potential effects and that an equivalent amount of time and effort should be focused on analyzing the impacts to resources for which the Presidio was established and which the Trust is mandated to protect and conserve.
6.	General	The Environmental Consequences Chapter should assess the effectiveness of each mitigation measures in reducing or avoiding the potential effects for which they were developed.
7.	General	A map of common place names should be included in the DEIS.
8.	General	It would be helpful if the mitigation measures were compiled into a stand-alone section of the DEIS.
9.	S-3	Paragraph 3. The discussion of Trust Act requirements should include reference to Section 103 (b)(1) and explanation of the consideration given to this section of the Act in light of the Trust's mandate for financial self-sufficiency by 2013. This section of the Act states "The Trust is encouraged to transfer to the Secretary [of the Interior] open space areas which have high public use potential and are contiguous to other lands administered by the Secretary" including those lands that "are surplus to the needs of the Trust and which serve essential purposes of the Golden Gate National Recreation Area." (DEIS Appendix B-3). Eliminating natural lands management from Trust responsibility could reduce expenditures by the Trust and avoid duplicating functions also performed by the NPS for Area A.
10.	S-3	Paragraph 5. The DEIS should be corrected to note that a "park-wide amendment" (a reference to the need to re-evaluate park-wide impacts), was prepared for the Letterman project EIS not because a different type of tenant was proposed from the original plan, but because the size and scope of the proposed Lucas development was larger than anticipated in the current plan. As is common in planning, when overall assumptions for an area exceeded, the area-wide assessment is reevaluated.

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11.	S-4 11	Paragraph 1. "The preservation of the integrity of the Presidio National Historic Landmark District status" should replace the term "historic compliance" in the summary list of objectives.
12.	S-4	Paragraph 1. The discussion of plan objectives should be preceded by a statement of the goals of the PTIP rather than the goals of an EIS in general. The only goals listed in the PTIP (p. 14-15) are goals "in relation to the GMPA". The actual PTIP goals are not stated. Both the DEIS and the Plan should have a statement of goals of the PTIP process and explain the relationship between the goals and the objectives (now listed only in the DEIS). The function of the "community assurances" in the PTIP should also be explained. Please clarify whether the assurances carry over into the DEIS and whether they function as Trust commitments to be adopted as policy.
13.	S-7	Per NPS comments during scoping, the Minimal Management Alternative should not be considered as a reasonable PTIP alternative. It provides "no formalized planning or policy direction" (DEIS p. S-7) and is therefore in violation of the Trust Act, which requires "sound principles of land use planning and management" to protect the park resources from development (16 USC 460bb§101(5)). This alternative does not conform to the Planning Principles, the Trust Act mandate to conform to the general objectives of the GMPA nor does it meet the goals and objectives of the Trust or the DEIS.
14.	S-7	Due to the length and complexity of the Summary Table, the Summary would benefit from a brief discussion of the significant adverse and beneficial impacts of each alternative.
15.	Table S-1 General	Table S-1 appears to imply that all adverse effects for all alternatives are mitigated by the mitigation measures listed in the left-hand margin. This implication is not borne out by the text. There is little discussion in the Environmental Consequences Chapter of the effectiveness of the mitigation measures in reducing the potential for effect. In other cases, the mitigation measure is noted as not effective in reducing the potential impact. The NPS recommends that the Table S-1 present the conclusions of effect AFTER the application of the mitigation measures.
16.	Table S-1 General	There are numerous errors in Table S-1, Summary of Environmental Consequences. Errors are of 6 types: 1. incorrect conclusion of effect of the GMPA 2000 Alternative (No Action Alternative) (GMPA 2000 Alternative), 2. inconsistency between the conclusion of effect under Environmental Consequences and the text inserted in Table S-1' 3. incompleteness in reporting the range of possible adverse effects from the Environmental Consequences Chapter, 4. inconsistency in comparing the potential effects of the alternatives against those of the GMPA 2000 Alternative. Effects are sometimes incorrectly compared to the Draft Plan Alternative (Preferred Alternative), 5. incorrect conclusions of the effect of the action alternatives and, 6. inconsistency in terminology used to describe effect of the action alternatives when the alternatives have similar effects. Comments 16-43 address Table S-1 and related text in the Affected Environment and Environmental Consequences Chapters.
17.	Table S-1 (also pages 221-223 and 231-232)	**4.2.1. Impacts on the National Historic Landmark District.** ***GMPA 2000 Alternative (No Action Alternative)*** • Table S-1 states for the GMPA 2000 Alternative: "Demolition of historic buildings would not differ from the 1994 GMPA." However, demolition included in the GMPA 2000 Alternative differs greatly from the 1994 GMPA. In 1994, 48 historic structures were proposed for demolition; 37 of these structures no longer exist. (Thirty-three buildings were removed as part of the Crissy Field project, 3 other buildings were removed due to structural deterioration or contamination). The PTIP should state that, based on a completed 106 consultation process required under the National Historic Preservation Act, the GMPA 2000 Alternative proposes a maximum of 11 specific, historic structures for demolition, totaling 32,155 square feet. Of these 11 structures, all but one are ancillary buildings, such as garages and storage sheds. Table S-1 and the Environmental Consequences Chapter should be revised to reflect this information. The 11 structures should be listed in a table with the building number, a brief description of the structure and the building square footage. • Table S-1, GMPA 2000 Alternative, states: "Removal of historic buildings would have an adverse effect on the NHLD, but not the status of the landmark." However, the text on PTIP DEIS page 222 states: "Because only those buildings previously identified for demolition would be demolished in the GMPA 2000 alternative, *there would be no new adverse effect* from demolition of contributing structures under this alternative." "In summary, the GMPA 2000 Alternative would *not have a new significant adverse impact on historic resources…*"[*Italics* added for emphasis]. Table S-1 should be corrected to remove the reference to an adverse

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		effect from the GMPA 2000 Alternative and state that removal of the 11 historic buildings was covered under a completed 106 compliance process and was found to have an overall beneficial effect on the NHLD. • Table S-1 for the GMPA 2000 Alternative states: "[The GMPA 2000 Alternative] Would not comply with Trust Act requirements regarding comprehensive management program." Little explanation is given in Table S-1 or pages 221-223 to explain how this conclusion was reached. Page 223, paragraph 1 states that 16 USC 460 bb (c) (1) requires an examination of "the cost effectiveness of building demolition." The Trust Act requirement to look at cost effectiveness applies only to the 11 structures already considered for demolition in the 1994 GMPA if they cannot be rehabilitated. A separate requirement of the Trust Act calls for "additional study of potential building demolition". There is no reason why this additional study could not occur under the GMPA 2000 Alternative. • The GMPA 2000 Alternative (No Action Alternative) is the sum of the adopted land use plan and the Final EIS adopted through the Record of Decision. This includes all cultural resource mitigation measures listed in the GMPA FEIS on pages 28-29. In the PTIP DEIS, it should be assumed that these additional measures apply, at a minimum, to the GMPA 2000 Alternative. Measures to be added to the DEIS include the requirement to update the inventory of historic buildings, the adoption of the Guidelines for Treatment of Cultural Landscapes and of the Guidelines for Compatible New Construction.
18.	S-10 and 223-224	**4.2.1. Impacts on the National Historic Landmark District.** ***Draft Plan Alternative and All Action Alternatives*** • Draft Plan. The language in Table S-1 should conform to that on page 224 of the DEIS which states that "new construction could have an adverse effect on individual buildings and/or the NHLD as a whole". • Draft Plan. Table S-1 text states that "new construction would be consistent with the Planning Principles and Planning District Guidelines." To avoid significant adverse impact to the NHLD status from the large amount of allowable new construction under the Draft Plan Alternative, the text should be amended to state that if new construction is found to adversely impact the NHLD status, the project would be modified to avoid the impact or, if the impact cannot be avoided, the proposal for new construction would be withdrawn from consideration. • Draft Plan and all action alternatives. The PTIP should include the comprehensive management program as required by the Trust Act. This would include the park-wide evaluation for possible demolition of the HABS categories 2 through 5 historic structures. The PTIP is proposed as the sole park-wide planning effort for Area B; it is therefore appropriate that this evaluation be important element of the PTIP. The structures that are candidates for evaluation should be mapped for each alternative, evaluated for effects individually and on the NHLD and the potential effects assessed in the cultural resources section under Environmental Consequences. The data used to develop the proposed demolition caps for each alternative, e.g., the 1.07 million square feet maximum demolition in the Preferred Alternative, should also be provided. • Draft Plan and all action alternatives. If the Planning Principles and District Guidelines are to be used to mitigate potential impacts, as stated in Table S-1 and in the Environmental Consequences Chapter, the principals and guidelines need to be included in the DEIS and assessed for effectiveness in protecting cultural resources and the NHLD status. • Draft Plan and all action alternatives. Table S-1 and the text in Environmental Consequences states that "New construction would be subject to further environmental review and National Historic Preservation Act (NHPA) consultation under Section 106." Consistent language is needed throughout the PTIP and DEIS to identify which projects would trigger future environmental assessments and public input. After review of the DEIS, it is not clear what types of actions (projects) have been adequately assessed in the DEIS and, therefore, should be implemented without additional NEPA review. Measure CR-4, the PTIP and the DEIS text addressing future planning should provide clear, consistent requirements for public review and a list and rough schedule of expected future planning efforts.
19.	S-10	**4.2.1. Impacts on the National Historic Landmark District.** ***Resource Consolidation Alternative*** • Conclusion of impact on the NHLD does not represent the conclusion made on page 225, paragraph 5. • Text should state that the alternative would have a significant adverse effect on individual historic resources and on the NHLD including the Public Health Services Hospital (PHSH) complex and other unspecified demolition of historic structures.

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		• It is our professional opinion that the consolidation of new construction in the historic areas of the Letterman Hospital, the Main Post and Crissy Field and the demolition of the historic PHSH would have an adverse effect on the NHLD.
20.	S-10 242 & 243	**4.2.1. Impacts on the National Historic Landmark District. *Sustainable Community Alternative and Cultural Destination*** • The conclusion of impact is incorrect in stating that effects to the NHLD are "possible significant adverse effect similar to the Draft Plan alternative", but either heightened or lessened effects. Without stating which structures would be demolished or the siting, size and type of new construction, the conclusion cannot be made that less square footage would actually result in "lessened effects." It has not been demonstrated that the Planning Principals or the District Guidelines would be sufficient in their application to prevent adverse effects. The text should be corrected to state that an adverse effect to the NHLD would occur due to unspecified new construction and unspecified demolition. • Table S-1 text does not reflect the conclusions made on page 226 – 227 and 228.
21.	S-10	**4.2.1. Impacts on the Cultural Landscape, *GMPA 2000 Alternative (No Action Alternative).*** • The text should clarify that new construction "would only be permitted if existing buildings and improvements did not meet essential management needs. (GMPA FEIS p. 189).
22.	S-10 229-231	**4.2.1. Impacts on the Cultural Landscape, *Draft Plan (Alt. 1), Resource Consolidation (Alt. 2), Sustainable Community (Alt. 3) and Cultural Destination (Alt. 4)*** • Alternatives 1 through 4 would have an adverse effect on the cultural landscape and the integrity of the NHLD. • The scale of demolition proposed in Alternatives 1 through 4 is vastly different from the GMPA 2000 Alternative which would remove from the cultural landscape only historic 11 structures, due to deteriorated condition, lack of historic integrity, contamination, the effects of which have already assessed through a completed 106 consultation and was found to have beneficial effects on the cultural landscape. • Similarly, the GMPA 2000 Alternative identified areas proposed for the demolition of non-historic structures and the construction of new structures. As similar information has not been provided for Alternatives 1 through 4, a finding that there would be a similar effect cannot logically be made. • The amount of square footage to be demolished in each alternative cannot be used as the sole indicator of effect. Often the removal of non-historic square footage would actually benefit the cultural landscape. It is the amount of unspecified demolition and new construction that leads to the conclusion that an adverse effect to the cultural landscape would occur.
23.	S-10 231	**4.2.1. Impacts on the Cultural Landscape, *Minimal Management Alternative*** • The effects of the Minimal Management Alternative are not assessed relative to the GMPA 2000 Alternative. • The Minimal Management Alternative would have an adverse effect on the cultural landscape as the Historic Forest would not be rehabilitated and replaced, the Main Parade Ground, historic streetscapes, paths and linkages would not be restored, the PHSH would not have the non-historic addition removed, East Housing would not be removed, and other features already assessed as part of the completed 106 consultation for the 1994 GMPA would not occur. • The DEIS does not provide an assessment of potential effects of the Minimal Management Alternative consistent with the level of assessment required under the NHPA that would allow a conclusion of a lesser degree of effect to be made.
24.	S-11	**4.2.2. Impacts on Archaeological Resources, *All Action Alternatives (Except Minimal Management)*** • The Draft Plan Alternative includes a possible underground parking garage that has the potential to adversely effect to archaeological resources to a degree much higher than the GMPA 2000 Alternative. The DEIS does not mention the underground parking garage, which is repeatedly noted in the Plan document (PTIP p. 52, 87, 91 and 149). The assessment of archaeological impacts should address subsurface parking facilities. The DEIS should also identify if the other action alternatives (except Minimal Management) include a possible underground parking facility.
25.	S-12 page 238-240	**4.3.1. Impacts to Native Plant Communities, *GMPA 2000 Alternative (No Action Alternative)*** • As clearly noted on page 238, the GMPA 2000 Alternative would have a beneficial effect on Native Plant Communities. • Table S-1 should include the expansion of Crissy Marsh as an important benefit to native plant communities.

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		• The statement "demolition, new replacement construction, and land uses" would effect native plant communities is incorrect. There is no "replacement construction" proposed as part of the GMPA 2000 Alternative. The areas of new construction under the GMPA 2000 Alternative do not support native plant communities so the effect would not occur. Demolition is sited in an area that would be recovered to provide essential habitat for the SF lessingia – other structures proposed for demolition would also not impact native plant communities. Table S-1 and the text on page 240 should be corrected. • To avoid the noted potential impact to the San Francisco Owl's Clover population north of the Log Cabin in Ft. Scott and isolated wetlands in these areas, the VMP zoning for the GMPA 2000 Alternative should be amended to protect these resources. These resources are recently discovered and the incorporation of this amendment would conform to the spirit of the GMPA to maximize native plant recovery and protect and restore pocket wetlands (GMPA FEIS p. 194, para. 3).
26.	S-12	**4.3.1. Impacts to Native Plant Communities, *Draft Plan Alternative (Alt. 1), Resource Consolidation (Alt. 2), Sustainable Community (Alt. 3), Cultural Destination (Alt. 4) and Minimal Management Alternative(Alt. 5)*** • The Alternatives 1, 4 and 5 do not have an impact similar to the GMPA 2000 Alternative. These alternatives would modify the VMP zoning map in the area of the Nike swale and the PHSH parking lot without providing compensating mitigation with an equivalent replacement ratio by type and value. • Alternatives 1, 3, 4, and 5 would have an adverse effect on native plant communities by not providing for Crissy Marsh expansion. • Alternative 1, 2, 3, 4 and 5 provide less acreage of native plant community than the GMPA 2000 Alternative. For example, the DEIS states the Draft Plan Alternative would have 7 acres less native plant habitat than the GMPA 2000 Alternative. The DEIS should then map where the 7-acres difference occurs and assess the effects of the reduction in native plant community by habitat quality, habitat value, and corridor connectivity. • To avoid the noted potential impact to the San Francisco Owl's Clover population north of the Log Cabin in Ft. Scott and isolated wetlands in these areas, the VMP zoning for all action alternatives (including Resource Consolidation but excluding Alternative 5) should be amended to protect these resources.
27.	S-12	**4.3.1. Impacts to Wildlife, *Draft Plan Alternative (Preferred Alternative)*** • The Draft Plan Alternative is not similar in effect to the GMPA 2000 Alternative. The Draft Plan Alternative would have an adverse effect on wildlife compared to the GMPA 2000 Alternative in not providing for the expansion of Crissy Marsh and by possibly siting new construction in the PHSH parking lot, an important wildlife corridor. • The relative amount of open space should be discussed relative to the 794 acres provided in the GMPA 2000 Alternative.
28.	S-12	**4.3.1. Impacts to Wildlife, *Resource Consolidation Alternative*** • The table and DEIS text on page 242 should be corrected to show that the increase in open space is from 794-838, a 44-acre increase compared to the GMPA 2000 Alternative. • (continued from above comment) The 44-acre area can only be assessed as a benefit if the specific characteristics of the 44 acres in relation to wildlife values are assessed.
29.	S-12	**4.3.1. Impacts to Wildlife, *Sustainable Community and Cultural Destination*** • These alternatives would have an adverse effect on wildlife not noted in Table S-1 by not providing for the expansion of Crissy Marsh and removing of an additional one-acre from Tennessee Hollow restoration corridor as the site of possible new construction. • The Cultural Destination Alternative would have an additional adverse effect on wildlife not noted in Table S-1 as a result of allowing development in the Nike swale area and the PHSH parking lot. • The conclusion of a beneficial effect to wildlife from increased acreage of open space must be based on an assessment of the actual wildlife values in the 12-acre increase.
30.	S-13	**4.3.1. Impacts to Wildlife Movement, *GMPA 2000 Alternative (No Action Alternative)*** • The NPS does not concur that the construction and demolition actions of the GMPA 2000 Alternative would significantly disrupt wildlife movement given the degree and effectiveness of the mitigation measures applied to reduce potential effects. • The text should be corrected to state that temporary disruption could occur during demolition but that mitigation would reduce the

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		effect to a minor adverse effect. • In the GMPA 2000 Alternative, new construction is minimal and not in wildlife corridors.
31.	S-13 251 – 252	**4.3.1. Impacts to Wildlife Movement, *All Actions Alternatives*** • This assessment suffers from the failure to identify what threshold constitutes an adverse effect to wildlife movement. The potential for effect is noted for each alternative but the DEIS fails to characterize the relative importance of the potential effect. The assessment is inadequate, as it provides no standard against which the public can compare the relative outcomes of the various alternatives. Each conclusion of impact should state whether the impact is beneficial or adverse, major or minor, direct or indirect, short-term or long-term.
32.	S-13	**4.3.1. Impacts to Special Status Plants, *GMPA 2000 Alternative (No Action Alternative)*** The conclusion of effect for the GMPA 2000 Alternative should state that GMPA 2000 Alternative would have a beneficial effect on special status plant species.
33.	S-14	**4.3.1. Impacts to Special Status Plants, *Draft Plan Alternative (Preferred Alternative)*** Minimal Management Alternative has an adverse effect because Wherry is not removed. The DEIS should assess the degree of impact on special status plants of the longer phasing of Wherry Housing removal in the alternatives.
34.	S-14	**4.3.2. Impacts to Wetlands and Other Features, *All Action Alternatives*** • Preferred Alternative. The impacts of the Draft Plan Alternative are adverse as compared to the GMPA 2000 Alternative rather than similar as listed in Table S-1. Page 262 of the DEIS states that "should the expansion [of Crissy Marsh] not occur, this alternative could result in an adverse impact to the hydrologic function of the tidal marsh system." • Preferred Alternative, Sustainable Community, Cultural Destination, Minimal Management Alternatives. As Crissy Marsh expansion is not provided for in the Plan or DEIS description of this alternative, there is potential for a significant adverse effect to the marsh function. This potential effect should be clearly stated in Table S-1. • All Action Alternatives. The potential impact of an underground parking garage on groundwater flow should be assessed.
35.	S-14	**4.3.2. Water Quality, *GMPA 2000 Alternative (No Action Alternative)*** • Table S-1 should clearly state that there is a potential for a adverse effect to water quality from the GMPA 2000 Alternative, particularly from demolition but the impact would be reduced to a minor adverse effect with the application of the mitigation.
36.	S-15	**4.3.3. Impacts to Visual Resources, *GMPA 2000 Alternative (No Action Alternative)*** • Table S-1 should state (per p. 267), that the GMPA 2000 Alternative would have a beneficial effect on the Visual Resources.
37.	S-15	**4.3.3. Impacts to Visual Resources, *All Action Alternatives (except Minimal Management)*** • The NPS does not concur that the Action Alternatives (except Minimal Management Alternative) would have potential effects on Visual Character similar to the GMPA 2000 Alternative. These alternatives all propose "unspecified" new construction within Area B. Some siting locations may affect viewsheds within the Presidio or affect the aesthetic character of areas that would be left undeveloped in the GMPA 2000 Alternative. • The mitigation measures listed in the margin of the table do not address reducing the effects of new construction. An assessment of the effectiveness of the mitigation measures should be provided in the text. • The Table states that the Draft Plan Alternative would have "a higher level of new, compatible construction." Is this implying a benefit to the visual character of the park by additional construction?
38.	S-15	**4.3.4. Impacts to Air Quality, *GMPA 2000 Alternative (No Action Alternative)*** Table S-1 should be corrected to state clearly that standard mitigation measures applied to the GMPA 2000 Alternative (No Action Alternative) would reduce potential demolition emissions to a to minor level of effect.
39.	S-15	**4.3.5. Impacts from Construction Noise, *GMPA 2000 Alternative (No Action Alternative)*** Table S-1 should state the conclusion of effect from page 286 finding that "strategies adapted from the GMPA EIS would adequately reduce construction and demolition noise [presumably to a minor level of impact].

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40.	S-17 290 – 295	**4.4.1. Impacts to Land Use, *Draft Plan Alternative (Preferred Alternative)*** The Table should be corrected to show that the Draft Plan Alternative has the potential for a significant adverse effect on land use. The NPS strongly disagrees with the conclusion that impacts from the Draft Plan Alternative would be similar to that in the GMPA 2000 Alternative. The significant adverse effect on land use is based on increased visitation, noise and traffic, adverse effects on the visitor experience and recreation as compared to the GMPA 2000 Alternative and the ineffectiveness of the mitigation to reduce potential effects. • The conclusion of effect in Table S-1 is based on a comparison to the existing condition and not to the GMPA 2000 Alternative. Land use should be compared to GMPA 2000 Alternative land use as should square footages of land use types. • Under the GMPA 2000 Alternative, the Main Post structures would house primarily visitor-serving and visitor program uses. The Draft Plan Alternative would focus visitor use outside of the buildings mainly for events, festivals, etc. The interior of the buildings are not set aside for visitor use but could be leased to long-term tenants for administrative and office functions. • The level of development and the intensity of uses possible in Area B of Crissy Field, as envisioned in the PTIP, would not complement the newly completed, low-density open space use at Crissy Project as predicted in the PTIP (p. 83). Yet the DEIS (p. 292) states that "[the Draft Plan in] Introducing active visitor oriented uses adjacent to a relatively passive recreation area could conflict with resource goals for the recently restored Crissy Field Marsh (Area A)." These statements indicate that not enough is known about the PTIP proposal for Crissy Field in Area B to make an adequate assessment of the degree of the compatibility between it and Crissy Field in Area A. Under the Draft Plan, Crissy Field in Area B would have 300,000 square feet more development than the GMPA 2000 Alternative for a total of 690,000 square feet. There is a wide range of general land use types proposed for this area and some of the buildings could house destination attractions and several museums. The DEIS should provide an assessment of the potential effects to cultural resources, visitor experience, traffic, visual resources, recreation which to develop an assessment of overall compatibility with Crissy Field in Area A. The DEIS should demonstrate, at this stage of planning prior to executing leases, that the Trust proposal would not diminish the qualities of open space and contrast from the adjacent urban areas that characterize Area A land use. • Measure CO-1 requires further clarification. The text description on page 292 states that "Mitigation requiring monitoring of Area B uses, and coordination with the NPS to ensure that proposed uses compliment Area A" would address potential effects. The word "uses" seems to limit coordination with the NPS to a time frame after Crissy Field, Area B, is developed when conflicts between uses may occur. The mitigation measure wording is also ambiguous. The NPS requests that CO-1 be modified to clarify the commitment on the part of the Trust , identify at what stages coordination between our agencies would occur and describe how the role of the NPS in the leasing and planning process for Crissy Field in Area B.
41.	S-17 290 – 295	**4.4.1. Impacts to Land Use, *All Action Alternatives*** • Table S-1 assessment for land use compares the Action Alternatives to the existing condition rather than to the GMPA 2000 Alternative. The conclusions should be modified to meet NEPA requirements. • The DEIS should assess whether the consolidation of new construction in the northern half of the Presidio is an adverse effect to land use as compared to the GMPA 2000 Alternative.
42.	S-17	**4.4.2. Impacts to Housing Supply, *All Alternatives*** • No conclusions of effect are given for this impact.
43.	S-18 308	**4.4.4. Impacts to Visitor Experience, *GMPA 2000 Alternative (No Action Alternative)*** • Table S-1 should conclude that the GMPA 2000 Alternative would have a beneficial impact on the visitor experience. • Table S-1 repeats the misconception that "the level of programming [under the GMPA 2000 Alternative] would depend on the initiative of park tenants". The description of visitor experience for the GMPA 2000 Alternative in the Table and on page 308 should reflect the visitor program set forth in the 1994 GMPA pages 24 - 32. The GMPA describes a range of both park-initiated and Presidio community-initiated programs in areas such as stewardship, cross-cultural communication, community service, health and scientific discovery. Also noted are an expanded visitor center, smaller museums, galleries, concerts, festivals, etc.

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44.	S-18 308 – 312	4.4.4. **Impacts to Visitor Experience, *Draft Plan Alternative (Preferred Alternative)*** • The Draft Plan Alternative would greatly increase visitation to Area B and concentrate visitor activities and attractions along Crissy Field. The NPS finds that the unspecified nature of the proposal and the high visitation and concentration of activities would not complement the adjacent Crissy Field Project in Area A and could adversely effect the visitor experience for visitors to Crissy Field. • Mitigation measures CO-4 through CO-8 would not be adequate to assure that impacts would not occur. An opportunity should given to the public and agency to consider a comprehensive planning process for Crissy Field in Area B before long-term leases are executed and projects approved one by one. Mitigation measure CO-5 would allow the Trust and NPS to confer reactively on how to solve visitor experience problems caused by projects already in place. Further Mitigation Measure CO-5 only offers a cooperative environmental review process for new forms of visitor activities, rather than for proposed projects and leases that would bring the visitor activities. • All Action Alternatives (except Minimum Management Alternative). Table S-1 should be corrected to reflect the potential adverse effect to the visitor experience in Crissy Field Area A as a result of the Action Alternatives (excluding the Minimum Management Alternative).
45.	S-19 312 – 314	4.4.5. **Impacts on Recreational Activities, *All Action Alternatives*** Table S-1 states that all action alternatives would have a beneficial impact on recreation. The assessment (pp. 312-314) does not address impacts to the recreational user groups in the Presidio. As with visitor experience, the large increase in annual visitation will impact recreation activities and use, especially along popular Crissy Field. The Environmental Consequences Chapter should assess the effects of development, traffic and visitation increases on recreational uses in Crissy Field and elsewhere in Area A.
46.	S-19 – S 21	No conclusions of effect are presented in Table S-1 (entitled Summary of Environmental Consequences) for Public Safety, Congestion, Parking Demand, Pedestrian and Bicycle Facilities, and Transit Demand impact topics.
47.	S-19	4.5. Congestion. Table S-1 should be revised to reflect the unmitigatable adverse effect for three intersection (based on Table 47, p. 326) and present the intensity of this effect.
48.	S-20	Parking. Clarify whether providing excess parking is an adverse or beneficial effect.
49.	S-21 - 24	Water Supply, Wastewater Generation, Storm Drainage, Solid Waste, Electricity, Natural Gas, Energy Consumption, Presidio Trust Operations. Based on the assessment in the Environmental Consequences Chapter, a conclusion of effect for the Alternatives should be added to the summaries (in Table S-1) under each impact topic. According to the assessment no adverse impact would occur with mitigation in force.
50.	7	Paragraph 2: " As authorized by the Trust Act, NPS, in cooperation with the Trust, provides visitor services and interpretive an educational services throughout the Presidio." Change this wording to "NPS shall be responsible, in cooperation with the Trust". This language more closely follows the Act's language.
51.	11 -13	The NPS recommends that each alternative be evaluated for its conformance to the Presidio Trust PTIP objectives. These objectives should be modified to include protection and enhancement of the park resources and the visitor experience.
52.	19	Administration. The list should include NPS administration offices, the Presidio Collections Facility, archives, the landscape plant nursery, native plant nursery, stewardship offices, dormitory housing, and facilities for archaeology, warehousing, maintenance, and interpretation and visitor services.
53.	20	Table 1: • The NPS recommends that the GMPA 2000 Alternative be noted as the No Action Alternative and that the column of existing conditions be deleted. Without this change, the GMPA 2000 Alternative could be confused as being an action alternative and the column labeled Current (2001) could be seen as the no-action alternative. • In addition to describing the square feet, the footprint (sq. ft coverage) of the existing and proposed construction would also be helpful.
54.	33 35	The PTIP DEIS proposes to modify the VMP and Finding of No Significant Impact (FONSI). To support the proposed amendment, the PTIP DEIS should provide a map of the proposed amendments to the VMP zoning for each alternative. The acreages, the proposed

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		zoning changes, the rationale for the proposed zoning changes, the impact of the proposed changes on the resources, proposed mitigation to reduce effect and the effectiveness of the mitigation should be clarified.
55.	37	Paragraph 4. The DEIS should note that is required that every federal agency reuse existing historic structures prior to new construction rather than stating that the Trust will make "...every reasonable effort...."
56.	37	"The historic character and integrity of the NHLD will be protected." This is a description of the Draft Plan. But on p. 223, the EIS admits that although the majority of demolition in the Draft Plan would be of non-contributing buildings, historic structures that may not be cost-effectively rehabilitated would be evaluated for demolition. Some of these may contribute to the NHLD, and the status of the NHLD "could be impaired through the loss of contributing buildings..." This contradiction between the two chapters of the document is confusing and leaves doubt as to the future of the NHLD.
57.	88 221, (para.5)	Paragraph 1. The discussion of the Trust Act and Historic Buildings gives an incomplete picture of the Trust responsibility and the current status of the NHLD. Despite the direction in the Trust Act, the Trust is still required to comply with the NHPA in regard to structures contributing to the NHL. The Section 106 evaluation must be in compliance with that the NHPA and it should be understood that removal of contributing structures, even those in the 1985 HABS listing, could pose an adverse effect to the NHL, leading to delisting. The discussion should also describe the role of the 1993 update to the NHL for purposes of 106 compliance.
58.	93 238	The description of plant communities, native vegetation, wetlands, special status plants etc. is written in excellent detail. The reader knows where each of these vegetative types occur on the site, which are in Area B, the names, status and habitat for each of the 13 species of special concern, etc. Yet, the impacts of the alternatives on these specific communities are not grounded in the detail provided in the Affected Environment Chapter. The Environmental Consequences assessment is instead based on acres of open space, square feet of demolition, as well as assurances that mitigation measures would protect vegetation. Resources described in specific detail in the Affected Environment Chapter (for example, "...a 0.6-acre serpentine outcrop in the vicinity of the World War II Memorial in Area B on p. 106), should also be analyzed for effect in site specific detail.
59.	108	The PTIP DEIS should state that the restoration strategies and mitigation measures in the VMP were adopted by the Trust through the signing of a Finding of No Significant Effect by the Trust Executive Director.
60.	127	Wetlands, Streams, and Drainages. The information here should be updated to reflect the most recent wetland delineation.
61.	135	The EIS includes a good summary of regulations and plans that have air quality implications, but does not describe affected environment at or around the Presidio.
62.	137	Noise. This section should also address the potential impacts of noise on wildlife.
63.	172	For clarity in understanding the scope of the PTIP, the document should identify those visitor facilities that are in Area A, administered by the NPS or administered under an agreement by the GGNPA.
64.	210	Page 212 (Water Quality) states that a series of oil/water separators treat storm water before discharging into Crissy Marsh. The discussion on page 210 indicates one oil/water separator on the E and F discharge line. Please confirm.
65.	222	Paragraph 2. "Under the GMPA 2000 Alternative, a maximum of up to 1.12 million square feet of buildings could be demolished. The majority of this demolition would be of non-contributing buildings..." This statement requires clarification. Rather than the "majority" of the demolition (implying over 50%), approximately 97% of the demolition would be non-contributing buildings. It would be more accurate to change "majority" to "nearly all" or "97%".
66.	222 –224 226 – 228	For all the action alternatives, it should be clarified whether the maximum square foot age for demolition includes demolition of the Commissary; PX and other structures if so required for the construction of adopted Doyle Drive alternative.
67.	222	Paragraph 2. The discussion of the GMPA 2000 Alternative should include a brief discussion of why, in the 1994 assessment, the overall effect to the NHLD was concluded to be beneficial despite the demolition of specific historic structures.
68.	222	Paragraph 3. An important oversight in the description of the effect of the GMPA 2000 Alternative is that new construction, 170,000 square feet total, would be proposed only to complement the protection or interpretation of park resources or to replace the functions of a building lost to demolition. In addition, the GMPA identified specifically where in the Presidio new construction and demolition would occur. Please add this information to the PTIP. The discussion of the GMPA 2000 Alternative fails to note that additional

No.	DEIS Page Reference	Comment
		demolition or new construction would require an amendment to the plan. The discussion of effect should cite the appropriate pages from the GMPA FEIS.
69.	223	Paragraph 2: "In accordance with the PTIP Planning Principles, the Draft Plan Alternative would preserve, rehabilitate and reuse historic structures to the maximum extent feasible." Given that information has not been provided on which structures would be preserved to the maximum extent feasible, this statement does not provide adequate assurances to characterize the potential impact to historic structures and the status of the NHLD.
70.	223	Paragraph 4. The DEIS should assess the effect of the reduction in the amount of demolition proposed on the NHLD, the cultural landscape and natural resources. For example, the Draft Plan would demolish 50,000 square feet less of structures than the GMPA 2000 Alternative. Since the GMPA 2000 alternative proposed mainly to remove non-historic structures to improve the NHLD and restore natural resources, the DEIS should consider the effect of reducing the demolition with focus on the specific resources that were to benefit from demolition in the GMPA 2000 Alternative. Note that the Draft Plan calls for 50,000 fewer square feet of demolition than the GMPA 2000 Alternative, and not the 500,000 square feet on page 223 in the DEIS.
71.	223	Paragraph 6. Since long-term leasing of non-historic structures may proceed immediately after the PTIP adoption, certain non-historic structures may be quickly leased and become unavailable to the pool of non-historic buildings that could be considered for demolition as mitigation to offset adverse effects to the NHLD. The NPS recommends that long-term leasing be delayed until district planning is completed to avoid reducing the range of mitigation opportunities that could be applied to reduce potential impacts to the integrity of the NHLD.
72.	224	Paragraph 2, "...the Trust would ensure that new construction is compatible with the existing historic setting and that the integrity of the NHLD is not substantially impaired." This statement should be corrected to delete the word "substantially" as a qualifier for "impaired". There are no levels of "impairment" for the consideration of NHLD status.
73.	225	Paragraph 3. Findings of effect need to be based on a comparison with the No Action Alternative. The PTIP DEIS states "Because there would be more demolition than under the GMPA 2000 or Draft Plan alternatives, it is likely that there would be less rehabilitation occurring under the Resource Consolidation alternative. All rehabilitation would comply with the Secretary of the Interior's Standards for the Rehabilitation of Historic Properties, and thus would constitute a beneficial effect of the alternative." This paragraph should be reworded to conclude simply that demolition of historic buildings is an adverse effect and that rehabilitation of fewer buildings than the No Action Alternative is also an adverse effect.
74.	226 – 228 229 - 231	Since the Action Alternatives (except the Minimum Management Alternative) do not identify those structures to be removed nor what type and where new construction would occur, and given the amount of total allowable square footage of demolition and new construction, it must be concluded these alternatives have the potential for an adverse effect to the individual structures, the NHLD status and the cultural landscape.
75.	229	"Features identified as significant [to the cultural landscape] (Land and Community Associates, 1992) would generally be maintained or enhanced." This conclusion should have been preceded by a supporting assessment. Given the unspecified new construction and demolition, the conclusion that the cultural landscape would be generally enhanced is not supported. The citation is not in the DEIS Reference list. Enough specific information should be provided to demonstrate what would be maintained/enhanced and what would be changed. The effects should be compared to the GMPA 2000 Alternative.
76.	225/ 231	Paragraph 1 and page 231, CR-1. HABS or other recordation is not mitigation for removal; removal is not mitigatable.
77.	232	CR-4 should be corrected to state that additional planning would be required "for any project ~~proposing demolition or new construction~~ that could result in an ~~new~~ adverse effect on historic resources. This should not be limited to only demolition and new construction nor is there any reason to limit it to "new" adverse effects since the PTIP DEIS, due to the lack of information on the future of the NHLD, cannot mitigate the potential for adverse effect from the PTIP action alternatives.
78.	235	The DEIS states the impacts "could range from minimal to significant for both prehistoric and historic sites." This statement is unsubstantiated. If the impact could be anything, then the project has not been developed to the point where "the effects can be meaningfully evaluated" (40 CFR§1508.23).

No.	DEIS Page Reference	Comment
79.	236-237	The mitigation measures lack the important commitment to contact and consult with Native American tribal representatives early in the planning process for projects proposed for areas with potential for "pre-contact" cultural resources. The measures should also include the provision to halt further ground disturbance when "pre-contact" resources are encountered or discovered, contact tribal representatives and, if recommended by the tribes, arrange for consultation and possible monitoring prior to continuing with disturbance actions. Tribes that have expressed strong interest in the Presidio are listed in the NPS MOA for Crissy Field.
80.	241 242 243	Paragraphs 2 (241), 6 (242) and 3 (243). In three of the alternatives, one acre of important restoration area at Tennessee Hollow would be lost to a residential use designation. Since the Tennessee Hollow restoration planning is not yet completed, the full area that may be considered for the restoration of the creek, woodland, and prairie system should be protected from development at least until a plan has been completed that will ensure habitat connectivity and adequate hydrology for the system to function. In the DEIS the potential consequences of this change in designation are documented (e.g. pg. 241 "Residential use of this area would interfere with a planned buffer and habitat link with adjacent areas"). In a National Park context, the highest value should be the resources, with development opportunities considered in areas with lower resource values – a principle generally followed in PTIP. The NPS recommends that any zoning change to "development" designations be delayed until Tennessee Hollow Restoration planning process can identify the area for potential restoration. If not, the DEIS should disclose what the project is that makes development here so necessary that impacts to the park resources cannot be avoided.
81.	241	More assessment should be focused on the potential impact to Crissy Marsh if the expansion doesn't take place. "...this alternative could result in an adverse impact to the health of the tidal salt marsh communities." This statement requires analysis to support an understanding of the degree of effect so that meaningful decisions can be made. The analysis should identify the benefits that expansion would provide to plants and wildlife and what the rarity of the tidal/wetland system of the GMPA 2000 Alternative is in the Bay Area. The expectation of the completed marsh should be described as part of the assessment of the GMPA 2000 Alternative. Then, each alternative that does not include restoration of the tidal prism would state that the benefits described in No Action would not occur, resulting in relatively significant adverse impacts to wildlife, plant life, etc.
82.	246	The DEIS states that "The more developed areas become, the less valuable they tend to be as wildlife habitat." This discussion should be expanded to address the degree to which this might happen, or the differences between alternatives. Construction impacts are temporary; however, the increased presence of humans, pets, noise, etc. could have an even more significant and permanent effect on wildlife species. The DEIS needs a further assessment of effect that considers visitor numbers, the kinds of recreation facilities and proximity to habitat, programming, interpretation and the location of new construction or demolition.
83.	252	Paragraph 1: It is not clear how the Resource Consolidation alternative would have the most beneficial effect on wildlife movement. This alternative has one less acre of native plant community than the no-action alternative and 300,000 more square feet of construction. The assessment should be more specific on the benefits accrued to wildlife and wildlife movement.
84.	256	Information is needed on 1) the timeline for the many native habitat restoration projects, 2) a standard for a minimum acreage to be restored annually and 2) the commitment to the resources needed to accomplish this goal, including collaboration with NPS.
85.	259	Mitigation Measure NR-12 requires that "disturbance to natural habitat areas will not exceed 20 acres within any given year." There is no reference to this measure in the impact assessment and the intent of the measure is not clear. Is the limitation proposed to address disturbance due to construction activities or for demolition-related disturbance or for native plant restoration activities? The DEIS should weave this mitigation measure into the discussion of effect it is intended to address.
86.	258	NR-7. Artificial Light. Delete the phase "where necessary" after "shield the use of artificial lighting". Other than for safety reasons (lights atop of towers), all lighting should be shielded in natural areas and in developed areas throughout the park.
87.	263	"Overall, the Resource Consolidation alternative would have the greatest beneficial effect on wetlands." This statement is not supported by the text. Additional information should be provided.
88.	264	The GMPA 2000 Alternative includes methods to conserve water, treat it, reroute storm draining, re-use waste water, etc. These elements of the GMPA 2000 Alternative should be assessed under Water Quality Impacts.
89.	265	The DEIS does not address the potential for adverse water quality impacts and biological impacts from pollutants in Area B runoff entering Crissy Field Marsh through the storm drain system. The NPS encourages the Trust to add, as mitigation, a systematic

5-18

No.	DEIS Page Reference	Comment
		program of storm drain water quality monitoring and a program to eliminate pollutant sources that could affect the marsh. Included in this mitigation would be an upgrade of the system servicing the area and the application of best management practices to minimize pollutants during any construction activities in the Crissy Field Marsh watershed.
90.	266	NR-18. The PTIP DEIS should provide more specifics regarding the valuation and accounting for compensating mitigation. The Trust should adopt a policy of "no loss of existing wetlands". The conditions that would permit the loss of existing wetlands should be explained further than "if not feasible". The replacement ratio for impacted wetland should be established in the DEIS if the "not feasible" trigger is reached. Strict monitoring standards for success should also be included.
91.	268	Paragraph 7. This section describes three locations in the Presidio, where, under the Draft Plan Alternative, new construction may be proposed. This information must be added to the description of the Draft Plan Alternative in the DEIS. Similarly, the areas of new construction should be described and shown for each alternative.
92.	270	Paragraph 2: Sustainable Community alternative. In the South Hills area, a 14-acre area, formerly housing, would be converted to 13 acres of landscape and 1 acre of native vegetation. The DEIS should explain why the entire area is proposed for restoration to native vegetation and explain the rationale for the proposed land use types.
93.	275	Table 36: The text should explain why a "Sustainable Community Alternative" has the worst air quality, highest noise levels and highest traffic levels.
94.	289	NR-25. Traffic Noise Monitoring and Attenuation. The NPS recommends adding monitoring in areas of high wildlife habitat value, and in natural areas used for quiet contemplation.
95.	292	The DEIS should identify which species would most likely be affected by noise or human presence and how the additional noise levels would affect these species.
96.	307	The lack of explanation of the methodology used in the Visitor Experience assessment prevents meaningful understanding of how the visitation numbers were derived. This seems key to many other analyses (traffic, cost-benefits, etc.) and could represent a major error repeated throughout the document.
97.	308 – 312	The assessment of effect to the visitor experience is inadequate. The EIS should address direct and indirect impacts to the visitor experience (including visitor perception of crowding) in both Areas A and B. As proposed in the Draft Plan, the Presidio's park-like character could be changed into a more urban experience, complete with hotels, shops, restaurants, offices, and increased traffic. The assessment of impact should include the potential effects of substantially increased visitation and the related traffic on the visitor experience at the Main Post, Crissy Field and elsewhere on the Presidio.
98.	308	Visitor Experience. The PTIP should specify that among the cultural institutions that could be accommodated on the Presidio is a Pacific Coast Immigration Museum. This Museum would interpret the history and issues associated with migration, immigration, and initial settlement that resulted in the peopling of the West Coast from aboriginal times up to present day. Initial feasibility studies by the NPS indicated strong interest and support and in-depth feasibility studies are scheduled for fall 2001.
99.	308 – 311 21	The visitation numbers presented on pages 308 – 311 do not conform to the visitation numbers presented in the Table 1 on page 21. The DEIS should explain which of these figures are correct and how the figures were derived.
100.	309	The EIS indicates the Resource Consolidation Alternative would "provide less variety of visitor facilities" than the GMPA 2000 alternative, but it would still result in nearly twice the number of recreational visitors as the GMPA 2000 alternative. Why is that? Same comment for Minimal Management which provides reduced basic interpretation and education programs, but still results in more than a million "extra" visitors per year.
101.	311	Paragraph 3: Minimum Management. The PTIP should state that, "...there will be ~~minimal additional~~ interpretive programs and ~~or~~ orientation signage installed". The Trust Act specifies that these decisions would be made by NPS, in cooperation with the Trust. The income generated by the Minimum Management Alternative should be sufficient to provide an annual support budget for visitor interpretation and programs.
102.	313	The range of recreational user groups described in the Affected Environment (p. 175) should be considered in the impact analysis.

No.	DEIS Page Reference	Comment
103.	315	The DEIS should explain why the level of demand for police services remains the same for the GMPA 2000 Alternative and Draft Plan Alternative when the latter has three times the visitation.
104.	330-332	The DEIS discussion on parking for each alternative is inadequate as indirect impacts to parking in Area A are not addressed.
105.	343	Mitigation Measure TR-18 states that the PTIP "would have an adverse impact on parking in Crissy Field". This conclusion of effect should be made in the assessment of parking impacts for each of the alternatives (pages 330-332). The assessment of effect should be based on the Crissy Field project as amended through the NEPA process, including Crissy Field EA/FONSI.
106.	343	Measure TR-18 places the responsibility of developing an effective mitigation program on the NPS. The NPS acknowledges the need to jointly develop a parking strategy for the Crissy Field area. To support this effort, the EIS should assess the potential effect of the Trust project and propose an effective and reasonable mitigation measure that the NPS could implement. This would not place the burden of research and development of the parking program on the Trust, the project proponent, rather than the NPS.
107.	345	Table 51: 4.6. Utilities. The DEIS should expand how the GMPA uses more water, and generates more wastewater, than the other more developed alternatives which have thousands more employees and residents.
108.	377	Paragraph 2: Add the $2 million annual budget for public programs to the discussion for the GMPA 2000 Alternative.
109.	378	Operating expenses are virtually the same for the GMPA 2000 Alternative and Draft Plan Alternative despite the additional staffing needed for the Preferred Alternative.
110.	383	Cumulative Impacts. The lack of the No Action Alternative makes the analysis very confusing as all alternatives are compared to current conditions not to the currently approved plan.
111.	383	The assessment of cumulative impacts to cultural resources and the integrity of the NHLD is inadequate. Comprehensive information on the future changes to the NHLD structures and landscapes by the PTIP is needed to be able to evaluate the PTIP in context with other related projects. A completed comprehensive management program as required by the Trust Act, would help develop an assessment of effect to the NHLD. Since the PTIP does not offer enough specificity to evaluate the effect to cultural resources, there is a potential for cumulative effect to the NHL leading to impairment and possible delisting.
112.	391	"Cumulative impacts on existing stream drainage and wetland resources are not expected to be adverse." Please clarify if this conclusion reflects potential effects from the Doyle Drive project.
113.	391	The cumulative impacts should be discussed for impacts to each resource area in each alternative, rather than lumped together. The reason for the separate approach is illustrated in the last paragraph in the Water Resources section on page 391. The analyst concludes there would be a cumulative beneficial impact on wetlands in all alternatives because of a net increase in wetland habitat and value. Although this may be true compared to existing conditions, this would not be true for all alternatives compared to No Action. There are differences between the cumulative impacts of each alternative that should be explained so they can be compared.
114.	401	Consultation under the NHPA. Please correct the text to show that the NPS has been consulting under the NHPA on this plan and other activities within the Presidio Trust jurisdiction.
115.	401	The Ohlone community has expressed an ongoing interest in the operations of the Presidio of San Francisco to the NPS and the Presidio Trust. This interest is not evident in the Plan, EIS, or Programmatic Agreement nor does it address the range of cultural resources laws related to native concerns.
116.	401	As we requested prior to publication, please replace the text describing Coordination with NPS with the following: "During the course of planning and the environmental review process leading up to the PTIP and Draft EIS, the Trust held regular meetings with the National Park Service to brief the NPS representatives on decisions that had been made regarding development of the Planning Principles and PTIP alternatives and to provide an opportunity for input and discussion."
117.	409	EO 11593. The text should describe the requirement of Section 110 of the NHPA to continue the evaluation of the cultural resources to determine whether they are historic and contribute to the NHL. This was done recently for Cold War-era structures as part of the Doyle Drive planning. The NHLD needs to be kept updated and it is now 8 years since the last update. Additional structures are now considered historic (50 years or older).

United States Department of the Interior
NATIONAL PARK SERVICE
Pacific Great Basin Support Office
1111 Jackson Street, Suite 700
Oakland, CA 94607

IN REPLY REFER TO:
N3615

Presidio Trust Implementation Plan
John Pelka, NEPA Coordinator
34 Graham Street
P.O. 29052
San Francisco CA, 94129

October 25, 2001

Dear Mr. Pelka,

I am the National Park Service Pacific West Region Air Quality and Natural Soundscapes Coordinator. I have been asked to review the air quality and noise sections of the PTIP EIS. The following are my comments.

Affected Environment
Air Quality 3.3.4
The section titled "Detailed Information of Historic and Contemporary Views and Vista" should include a discussion of the California State visibility standard.

Air Quality Conditions and Monitoring section, 2nd paragraph could include the air quality monitoring site at Point Reyes National Seashore upwind from the Presidio, which is representative of good air quality in the Bay Area. Point Reyes has a history of monitoring data for ozone and particulate matter.

Noise 3.3.5
Suggest adding the following language to this section "The Presidio is a unit of the National Park System. The National Park Service (NPS), has management policies which require all facilities be managed, operated, and maintained to minimize noise pollution in parks (Director's Order #47: Soundscape Preservation and Noise Management).

Table 7: FHWA Noise Abatement Criteria, Activity Category D. Under the "undeveloped lands" category there are no applicable dBA levels given. It would be appropriate for the undeveloped areas of the Presidio to maintain the highest level of quiet to preserve the natural and cultural landscape of the park. Noise levels in these areas should strive to be below 50 dBA.

Noise Sensitive Areas should include all the areas identified for the Doyle Drive Reconstruction Project. Contact Rick Foster, National Park Service 561-4472 for the list of Doyle Drive Sensitive Areas.

Environmental Consequences
Air Quality 4.3.4
Methodology sections says that heavy equipment construction emissions of NOx, CO, SO2, and ROG are included in the Bay Area Air Quality Management District's regionwide inventory. It would be good to mention how this is possible. Does the inventory predict which construction activities will occur in a certain time period? Since the area is non-attainment for ozone, the precursor pollutants of NOx and ROG should be mitigated to reduce further impacts to the area.

Table 35: Feasible Control Measure for Construction Emissions of PM. This table references a 1996 source, BAAQMD should have a more recent source to use.

Regional Emissions
First paragraph, 1st sentence, remove the word "could" from in front of "cause" since this is a definite occurrence.

2nd Paragraph, 1st sentence, define "significant" related to emissions of ROG, NOx, and PM. If there is a significance level it should be provided in table 37 for comparison purposes.

General Construction/Demolition Activities
It would be very helpful if you provide the percentage differences between GMPA 2000 and each of the other alternatives for demolition and new construction. This will allow the reader to be able to assess the impacts more easily.

Consistency with Regional Clean Air Plans
The EIS discloses that attainment of the ambient air quality standards may be delayed due to increased residences and employees, for all alternatives. It implies that because the long-term growth would be incorporated in the 2003 revision of the BAAQMD Clean Air Plan these emissions are not a problem. However, there is no guarantee that BAAQMD will approve these emissions given their deadlines for meeting attainment. This is a problem for each alternative.

Same comment as above holds true for the Regional Emissions section which deals with daily vehicle trips.

Mitigation Measures
This section should also address PM2.5

Noise
Methodology, 1st paragraph
In addition to the Federal Highway Administration criteria the PTIP should also reference National Park Service Director's Order #47 Soundscape Preservation and Noise Management. This document can be found on the NPS web site at www.nps.gov and can be used to supply language on NPS policy related to noise management and natural soundscapes.

Need to include the noise sensitive areas as defined for the Doyle Drive Reconstruction Project. Noise mitigation measures should be developed for each noise sensitive area.

Thanks for the opportunity to comment.

Sincerely,

/s/ Judy Rocchio

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

October 25, 2001

John Pelka
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Dear Mr. Pelka:

The Environmental Protection Agency (EPA) has reviewed the **Draft Environmental Impact Statement (DEIS) for the Presidio Trust Implementation Plan (CEQ #010264).** Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The Presidio Trust (Trust) proposes to update the General Management Plan Amendment of 1994 (GMPA) for the Presidio Area B, based on changed circumstances and new policies for management of the Presidio. The DEIS evaluates six alternatives, including the preferred Draft Plan alternative, for managing Area B of the Presidio (about 80 percent of the Presidio property) which is under the management of the Trust as stated in the Presidio Trust Act of 1996. Under the 1996 Act, the Trust is to manage Area B facilities to be financially self-sufficient by 2013. Each of the alternatives achieves this goal in varying degrees, with differences in the amount of building and open space, level of public and community programs, and amount of residential and commercial uses. The DEIS is a programmatic document, evaluating general land uses for Area B. The DEIS states that future site-specific and area plans will undergo further environmental review under NEPA.

A GMPA 2000 alternative is used as the baseline, no-action alternative, although it includes modified actions from the 1994 plan in order to make the Presidio financially self-sufficient by 2013. The preferred Draft Plan alternative would include a mix of demolition, replacement construction, rehabilitation of existing buildings and restoration of open space and recreation facilities. Under this alternative, open space would be increased, the number of housing units would not be reduced, and there would be additional cultural and educational programs for park visitors.

The DEIS is a very well written, thorough document. The Trust has provided extensive opportunities for the public and interested parties to participate in the discussion and planning of land use and facilities management in the Presidio. Substantive information was provided to the public during the scoping process, and numerous public meetings have been held to get input on the Draft Plan. The DEIS states that additional NEPA evaluation of site-specific projects or area plans will be undertaken in the future, and EPA encourages the Trust to meet that commitment.

EPA recognizes the challenges in managing a National Park property that has significant historical value with the sometimes competing demands for meeting local community, environmental and financial sustainability goals. We commend the Trust for developing management plans which balance these demands and improve the environment in the Presidio. However, we have some unresolved concerns about potential impacts associated with the higher level of proposed cultural and educational programming, visitor and commercial facilities, and housing in the Draft Plan compared to the GMPA 2000/no-action alternative. As such, we have rated this DEIS as category EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of EPA Rating System"). In particular, we are concerned about impacts to wetlands, traffic, and air quality.

We appreciate the opportunity to review this DEIS. Detailed comments are attached. Please send two copies of the Final EIS to this office at the same time it is officially filed with our Washington D.C. Office. If you have any questions, or wish to discuss our comments, please call Ms. Shanna Draheim, of my staff at (415) 744-1574.

Sincerely,

Shanna W Draheim

for Lisa B. Hanf, Manager
Federal Activities Office
Cross Media Division

Enclosures: Detailed comments

cc: Wendy Poinsot, National Park Service, Golden Gate National Recreation Area

Wetlands

Each of the alternatives evaluated in the Presidio Trust Implementation Plan (PTIP) Draft Environmental Impact Statement (DEIS) includes some expansion of open space, restoration of riparian corridors, and other best management practices which will ultimately benefit the health and functioning of aquatic ecosystems within the Presidio. The Draft Plan however, has more impacts to wetlands than some of the other alternatives, specifically the General Management Plan Amendment 2000 (GMPA 2000) alternative. The GMPA 2000 alternative commits to an expanded tidal marsh at Crissy Field and restored connection to the Tennessee Hollow and Dragonfly creek systems. The Draft Plan alternative only commits to further study of the feasibility of tidal marsh expansion and connection. Many scientists and community members have strongly argued that the marsh must be expanded in order to fully realize the restoration goals laid out in the original restoration plan. The DEIS even notes that should the expansion not occur, there could be "an adverse impact to the hydrologic function of the marsh system" (p. 262). As such, EPA encourages the Trust to adopt this portion of the GMPA 2000 alternative, and commit to expanded restoration of the Crissy Field marsh.

- *Recommendation: The PTIP should include a commitment to an expanded tidal marsh at Crissy Field through removal of the Post Exchange and Commissary Buildings, or by other feasible design options in either Area A or B of the Presidio.*

At the Public Health Services Hospital (PHSH) and Nike Missile Site, the Draft Plan calls for new and renovated building space and new landscaping, instead of native plant restoration as envisioned in the GMPA 2000 alternative. The increase in impervious surface and non-native landscaping could have impacts on the hydrology and water quality of the adjacent wetlands, as well as impacts to the federally-endangered San Francisco lessingia.

- *Recommendation: The PTIP should limit construction of new building space/impervious surfaces and non-native landscaping in the PHSH and Nike Missile site areas to better protect the health and functioning of the adjacent wetlands.*

Traffic and Parking

According to the DEIS, growing population and travel in the San Francisco Bay area by 2020 is going to increase traffic problems in the Presidio regardless of which alternative is implemented. The PTIP includes an extensive Transportation Demand Management (TDM) program to discourage single occupancy vehicle (SOV) use within the Presidio and surrounding areas. The Plan includes many excellent strategies for encouraging public transit and car pooling. However, options for managing parking in the Presidio under all alternatives appears to work against these goals. The DEIS states that parking will be reduced for all alternatives as a way to discourage SOVs. However, for all six alternatives the supply of parking exceeds the projected

level of demand. For the Draft Plan, the surplus is over 1,600 parking spaces. Also, the DEIS does not include any discussion of parking fees as a traffic management tool, and revenues from parking fees are not included in the estimated budgets for the alternatives.

- *Recommendation: In order to discourage SOV use and reduce overall impacts on traffic, the TDM plan should include a strategy for limiting the supply to equal or less than the demand for parking in the Presidio. Also, the PTIP should specifically discuss how parking could be priced to discourage the use of SOV in favor of transit (i.e. commit to pricing at or above average market rates for the city).*

Air Quality

The DEIS evaluates potential impacts on air quality from stationary and mobile source emissions. The document evaluates the six alternatives for their consistency with the regional Clear Air Plan (CAP) implemented by the Bay Area Air Quality Management District (BAAQMD), and provides average daily estimates of reactive organic gases (ROG), particulate matter (PM10), carbon monoxide (CO) and nitrogen oxides (NOx). The DEIS states that if housing or employment growth outpaces estimates in the current (2000) CAP, then associated emissions might be inconsistent with the current plan. Has the Trust initiated discussions with BAAQMD regarding future CAP planning to incorporate new growth projections for the Presidio? The DEIS does not provide any information on potential constraints to accommodating increased growth estimates for the Presidio in future CAP updates.

- *Recommendation: the FEIS should demonstrate that the Trust has coordinated with BAAQMD in incorporating new housing and employment projects in future CAP updates.*

In evaluating the applicability of the federal General Conformity Rule (40 CFR 51.853) to the PTIP, the DEIS states that future emissions associated with implementation of the programmatic PTIP do no meet the rule's dual criteria of being reasonably foreseeable and within the continuing control of the Trust. As a result, "they are not included in the general conformity analysis" (p. 412). This statement seems incorrect given that daily average emissions estimates have been generated for all six alternatives based on projected level of development and services in the Presidio (provided in Table 37, p. 277). This data should be provided in tons per year in order to demonstrate the project's applicability under 40 CFR 51.853.

- *Recommendation: the FEIS should include estimates of direct and indirect emissions of ROG, NOx, and CO associated with the six alternatives in tons per year. If they exceed the 100 tons per year significance threshold, then a conformity determination is required and should be included in the FEIS.*

Finally, the DEIS provided average CO concentrations at eight intersections within the Presidio, none of which exceed national or state ambient air quality standards. However, the document states that violations are predicted to occur in 2010 at nearby highway locations and the Golden Gate Bridge toll plaza, outside of the project area. Implementation of the plan could have a

cumulative impact on CO concentrations at those spots due to higher vehicle use related to the PTIP. CEQ Regulations at 40 CFR Part 1508.7 define cumulative impacts as those which result "from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions."

- *Recommendation: If the PTIP contributes to a degradation in the level of service (LOS) for traffic at those locations, then the DEIS should discuss the cumulative impacts on CO concentrations in those locations.*

United States Department of the Interior
FISH AND WILDLIFE SERVICE
Sacramento Fish and Wildlife Office
2800 Cottage Way, Room W-2605
Sacramento, California 95825-1846

IN REPLY REFER TO:
1-1-01-RC-3417

October 23, 2001

John Pelka
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, California 94129-0052

Subject: Comments on Presidio Trust Implementation Plan Draft Environmental Impact Statement, July 2001

Dear Mr. Pelka:

The purpose of this letter is to provide comments on land use planning alternatives for the Presidio described in the Presidio Trust Implementation Plan (PTIP), as analyzed in its Draft Environmental Impact Statement (DEIS) of July 2001. These comments are provided pursuant to the National Environmental Policy Act of 1969 (NEPA; 40 CFR 1500.5, 1503.2, 1503.3) and the Endangered Species Act of 1973, as amended (ESA). The Presidio Trust (Trust) and the Golden Gate National Recreation Area (GGNRA, National Park Service) have been engaged in discussions (early and informal endangered species consultations pursuant to 50 CFR 402.11, 402.13) with the U.S. Fish and Wildlife Service (Service) regarding endangered species recovery in the Presidio since 1998 (letter and attachments from James Meadows, Executive Director, Presidio Trust, to Michael Thabault, U.S. Fish and Wildlife Service (USFWS), August 31, 1998). The Service previously submitted formal comments on the Presidio Vegetation Management Plan (Service File Number: 1-1-99-I-2019) and on the PTIP process (Service File Number: 1-1-01-RC-0800). Our previous comments and discussions were based in part on the administrative draft recovery plan for San Francisco lessingia (*Lessingia germanorum*) and Raven's manzanita (*Arctostaphylos hookeri* ssp. *ravenii*), and are incorporated here by reference. We expect the public draft of the recovery plan to be in circulation by November 2001.

The scope of the Service's comments on the DEIS include a wide range of environmental and regulatory subjects, but our central concern remains the coordination between land use planning in the Presidio and the recovery of ecosytems on which federally listed species depend. We

acknowledge that the updating and revision of the Presidio's General Management Plan Amendment, which is the essence of the PTIP process, is a major and complex effort. The intent of our comments and questions is to assist in compliance with NEPA and the Act as a cooperating agency, and to clarify and resolve potential conflicts of competing land uses identified in the DEIS. We appreciate the Trust's demonstrated willingness and efforts to conserve its natural resources and endangered species ecosystems, and look forward to continuing cooperation.

Our comments and questions regarding PTIP-DEIS are organized as general comments on NEPA and the PTIP planning process, specific comments on PTIP proposals or analysis, and technical comments on the document (emphasizing natural resources and geography).

I. General comments

1. Purpose and Need for PTIP, and type of of EIS

A clear, specific statement of project or program purpose and need is a critical element to evaluation of NEPA alternatives. It provides the shared standard by which all alternatives must be equitably compared, and therefore the basic standard of "reasonableness" (46 FR 18026 as amended, 51 FR 15618) to eliminate alternatives which do not justify full and rigorous evaluation (40 CFR 1502.14). The DEIS refers to PTIP as a "plan update" relative to the General Management Plan Amendment (GMPA, 1994) for the Presidio, which suggests that the DEIS is a supplement of the GMPA EIS within the meaning of 40 CFR 1502.9. This is reinforced by the summary statement of its underlying purpose and need, "to provide a policy framework to guide the Trust's successful implementation of the Trust Act by updating the management concepts and land use proposals for Area B identified in the 1994 GMPA" (DEIS, p. S-3). The DEIS later stresses the GMPA as "the foundation that guides the Trust's planning and decisionmaking", and further states that "the EIS tiers from and supplements the GMPA EIS..." (p. 1, DEIS). This complex characterization of the PTIP purpose and need, and nature of the EIS, raises questions which are essential to the evaluation of alternatives under NEPA, and consultations under ESA.

The most specific discussion of purpose and need for PTIP and its multiple programmatic objectives (pp. 9-13, DEIS), enumerates and explains the policy-level issues for the changed circumstances and statutory changes regarding land use planning in the Presidio. It does not, however, specifically contrast and compare the programmatic purpose of PTIP and the GMPA. The contrast between these programs is essential to evaluation of project alternatives (see discussion below). Without identification of the specific program differences between the GMPA and PTIP, it is not possible to compare alternatives in terms of whether they meet or fail to meet the program purpose. We recommend that the Trust prepare a matrix (table) which emphasizes the relevant basic contrasts or changes in policies between GMPA and PTIP, point for point. This will clarify for all readers any proposed changes from the GMPA.

Overall, the most fundamental difference between PTIP and GMPA appears to be the statutory requirement for the Presidio's scheduled financial self-sufficiency. Where this changed circumstance would cause one alternative to fail the enlarged program purpose (compliance with Trust Act requirements), and another alternative which would otherwise be environmentally preferable to achieve the program purpose, the contrast should be explicitly stated pursuant to 40 CFR 1502.14. To the extent that PTIP plans which further the purposes of NEPA are affected by changes in mission or policy, or are made incompatible with changes in mission or policy, they should be expressly reviewed in the EIS pursuant to 40 CFR 1500.6. We recommend that the final EIS include a tabular comparison of alternatives which specifies the degree to which each alternative meets the criterion for economic self-sufficiency, considering any appropriate "mitigation" to enable it to do so that it is consistent with that alternative.

The DEIS offers various contrasting references to PTIP as a "project" and a "plan" or "program" (e.g. "project", p. S-4; "programmatic", "program", pp. S-9). Overall, PTIP as presented must be considered to be a program (40 CFR 1508.28), a conceptual land use plan for a geographic area, and not a large definite project proposal. This is significant, because the DEIS states that "some individual projects that are consistent with PTIP could proceed immediately, likely without need of environmental review beyond the PTIP EIS". If, as the DEIS states, "as with the GMPA and GMPA EIS, the proposed PTIP and PTIP EIS are broad, programmatic-level documents" (DEIS, p.1), then individual projects within the scope of PTIP would need "tiered" project-specific NEPA compliance (project-specific EIS or EA) unless the action were subject to a categorical exclusion from NEPA (40 CFR 1502.20, 40 CFR 1506.1, 48 FR 34263). Similarly, individual projects within the scope of PTIP would also need project-specific ESA compliance. We support full project-specific NEPA and ESA review, because seemingly minor projects can have cumulatively significant impacts, or contribute towards significant commitment of resources to particular alternatives before they are fully compared with others.

NEPA provides criteria to determine whether a supplemental EIS is mandatory or voluntary (40 CFR 1502.9). Supplements are required when the agency makes "substantial changes" in a proposed action that are relevant to environmental concerns, or when there are "significant new circumstances....relevant to environmental concerns" (40 CFR 1502.9(c)). The DEIS states that "many of the Trust Act requirements for management of Area B differ significantly from those of NPS" (p. 2-2, pp. 8-11, DEIS) and indicates significant differences among the environmental consequences of the "Draft Plan" and "GMPA 2000" alternatives (Table S-1, DEIS). These significant differences between the GMPA and PTIP also indicate the requirement of a supplemental EIS. If the differences between GMPA and Draft Plan alternatives were not significant in terms of environmental consequences, there would be no reason to treat them as distinct alternatives in the DEIS. The issue of whether an EIS is "required" or voluntary is relevant to the limitation on federal action during the NEPA process: "While work on a *required* [emphasis added] program environmental impact statement is in progress and the action is not covered by an existing program statement, agencies shall not undertake in the interim of any major federal action covered by the program which may significantly affect the quality of the human environment unless such action....is itself accompanied by an adequate environmental

impact statement..." (40 CFR 1506.1(c)). This restriction is related to the NEPA prohibition on project piecemealing (40 CFR 1502.4).

2. Comparison and range of alternatives.

The range of alternatives selected for rigorous evaluation in an EIS should emphasize "real environmental issues and alternatives", and assess those alternatives to proposed actions that will avoid or minimize adverse effects of these actions (40 CFR 1500.2). Alternatives that represent extremes providing only points of reference for purposes of analysis, or popular alternatives suggested during scoping which do not meet the project purpose, should not be included in the evaluation of alternatives.

All alternatives selected for full review should also include all reasonable, practical, and appropriate mitigation to enable them to be both "reasonable" and achieve the broader objectives of NEPA (minimization of adverse impact, maximization of quality and enjoyment of the human environment). Also, the EIS must state how alternatives will or will not achieve NEPA policy goals and related environmental policy objectives (40 CFR 1502.2(d), 1502.14 (f), 1502.16(h)). The construction of otherwise reasonable alternatives with greater overall environmental benefits relative to the "no action" or preferred alternative should not be unnecessarily burdened with components that make them infeasible (fail to meet the project purpose), impractical, or "less competitive" than proposed actions. For example, the "Resource Consolidation" alternative includes proposals for "removal of all the historic buildings and cultural landscapes...which would be considered an adverse effect of this alternative". This removal appears to be an unnecessary burden for this environmentally beneficial alternative. If the overall environmental benefits of this alternative would be jeopardized by an excessively imbalanced use of competing natural and cultural resources, the conflict should be avoided or mitigated (40 CFR 1502.15(f)), rather than allowed to compromise the feasibility of the alternative. NEPA stresses the harmonious balance among resources to attain the widest range of beneficial uses without degradation or other undesireable consequences (NEPA Sec. 101 [42 USC §4331]). We recommend that the "Resource Consolidation Alternative"be revised to minimize all avoidable or unmitigated conflicts between competing resources. Environmentally beneficial alternatives should be constructed to be reasonable, rather than arbitrary or abstract extremes for comparison.

The "Minimal Management" alternative also appears to contain incompatibilities with both the GMPA and PTIP. It minimally achieves the project purpose (note the relatively poor financial comparison in Impact 4.7 of Table S-1, DEIS), and results in a poorer quality of the human environment than other alternatives. As such, this alternative does not comply with NEPA policy (40 CFR 1500.2), and we recommend that it is eliminated from further review, and this action explained, in the final EIS. The DEIS seems to recognize that the Minimal Management alternative is exceptional, but does not clearly explain why, for purposes of NEPA, it was evaluated in detail. The Minimal Management alternative lacks the environmental assets of the GMPA 2000 alternative (the "no action" alternative), and is projected to support a low level of financial support to public programs (Table S-1, DEIS). In addition, it appears to severely constrain or eliminate future large-scale habitat restoration and preclude recovery of listed

species. Section 7(d) of the ESA prohibits federal agencies from taking actions that would preclude recovery of listed species. Therefore, the Service suggests that this alternative be eliminated from further consideration.

The GMPA 2000 alternative represents the "no action alternative" (p. S-4, DEIS). As such, the GMPA 2000 alternative should also represent the "environmental baseline" or benchmark, for purposes of assessing the environmental consequences of all other alternatives (46 **FR** 18026). Impact assessment, however, appears to use existing conditions as the environmental baseline for purposes of comparing environmental consequences throughout most of the document. If the "no action" alternative is not used as the benchmark for environmental assessment and comparison of alternatives, then another reasonable standard, such as existing conditions or GMPA 1994 conditions, should be explicitly and consistently applied. In the summary comparison of alternatives (Table S-1, DEIS), the benchmark for comparison shifts between existing conditions, GMPA 2000, and the Draft Plan alternative. This table and related parts of the EIS should be revised to a consistent and clear standard of comparison.

3. Identification of "environmentally preferable alternative"

We recommend that the Trust identify the environmentally preferable alternative. By focusing on constructing an alternative that is environmentally preferable, it would be more efficient to improve the deficiencies (environmental, financial, or practical) of the array of alternatives considered, and recombine their strongest components. It would also be helpful to contrast and compare the differences between the environmentally preferable alternative and the "agency's preferred alternative" presented in the Draft Plan alternative of PTIP (40 CFR 1502.14(e)), and provide brief explanations why components of the environmentally preferred alternative were not included in the agency's preferred alternative. Since the environmentally preferable alternative(s) must be identified in the Record of Decision (40 CFR 1505(b)), this approach would facilitate NEPA compliance.

4. Procedural and substantive mitigation measures

The NEPA definition of "mitigation" stresses substantive, feasible, adequate, effective actions that would actually reduce or eliminate a potential adverse environmental impact (40 CFR 1508.20, 46 **FR** 18026). Even in programmatic EIS's, mitigation measures should focus on real, causal relationships between physical or biological impacts and efforts to avoid, minimize, or offset them. Indefinite and purely procedural "mitigation" measures should not be proposed in lieu of substantive mitigation measures. Conceptual mitigation alternatives be matched with proportional specificity to conceptual project or program proposals. For example, mitigation measure NR-4 (p. 257, DEIS) relies on "review" or "focus" of future planning to "ensure consistency with" endangered species recovery plans. The Service appreciates the cooperative intentions expressed by this mitigation measure, but it is too general to be useful for evaluation even in a programmatic EIS. In contrast, mitigation measure NR-5 (p. 257, DEIS) and UT-1 (p. 347, DEIS) refer to a suite of specific, substantive actions which can be evaluated in terms of appropriateness and effectiveness at addressing their relevant impacts.

5. Consistent specificity of alternatives

The level of detail and analysis for all reasonable alternatives evaluated should be similar to that of the proposed alternative and in proportion with the importance of their environmental consequences (40 CFR 1502.14, 1502.2(b), 46 **FR** 18026). Within each Planning District, there are numerous planning elements, or potential individual projects, such as the Public Health Services Hospital (PHSH), Nike Missile site, Wherry Housing, and Crissy Field wetland expansion. In discussion of environmental consequences of project alternatives, some potential individual projects are discussed in detail, while in other alternatives are not. In some cases, such as the Crissy Field wetland expansion, it is not clear why the proposed treatments of the potential projects differ (*e.g.* feasibility study versus proposed action) among alternatives. In many cases, such as the PHSH planning district, we found greater detail, or new proposals, covered in the DEIS Draft Plan alternative than were proposed in PTIP, although not in the key section on environmental consequences. We recommend that potential individual projects be carried through summary tables, descriptions of alternatives, and discussion of environmental consequences consistently. Systematic presentation of potential project-specific or district-specific impacts should be located in the chapter on environmental consequences, rather than general overviews which cover acreage and objectives. Where the DEIS describes project elements of the Draft Plan alternative which are not mentioned, or mentioned only generally or implicitly in PTIP, the source of the additional project proposal should be cited.

We recommend using consistent language, style, and perspective when evaluating comparable environmental consequences in the EIS, to avoid the unintended appearance of bias. For example, some alternative impacts are described as "less beneficial", while others are described in their own descriptive, non-normative terms, and others are evaluated as adverse impacts (Table S-1, DEIS). It would be most appropriate to describe the environmental consequences factually, and evaluate them in terms of the NEPA factors relevant to "context or intensity" of impacts (40 CFR 1508.27).

6. Determination of impact significance

NEPA regulations contain specific guidance for interpretation of environmental impact significance (40 CFR 1508.27). Generally, the DEIS provides little or no explanation of why environmental impacts are evaluated as less than significant or significant. Factors such as controversy, unique geographic characteristics (including ecologically critical areas), precedent-setting actions, and the degree to which an action may adversely affect an endangered species or its habitat, are expressly included in NEPA consideration of "intensity" of an impact. This is particularly relevant, we believe, where the recovery of endangered species ecosystems is uniquely associated with soil and topographic features which relate to distribution and abundance of actual and potential endangered species populations. When evaluating the impacts of alternatives on different resources, it is important to consider the relative weight of factors like uniqueness/replaceability, degrees of uncertainty, etc. Without specific explanation of how the Trust evaluates the weight of impacts, it may be difficult to understand how alternative plans are justified.

II. Specific comments

1. Wherry Housing

PTIP refers only to the "eventual" removal of non-historic housing at the Wherry Housing site (p. 126, PTIP), and proposes to "Remove the Wherry Housing complex, restore native plant communities, and expand the adjacent central dune shrub habitat as guided by the VMP...." (p. 132, PTIP). As indicated in our comments on the Presidio Vegetation Management Plan (Sept. 29, 1999), we strongly support the timely demolition of the Wherry Housing units, and restoration of dune habitat as proposed in the draft recovery plan for San Francisco lessingia. We also concur with the Trust's earlier, specific proposal (Presidio Trust's Financial Management Plan of 1998) for "demolition occurring in multiple phases spread over a 30 year period....will begin within 10 years and every attempt will be made to reach the GMPA goal of full demolition by 2010. Revenues generated by the lease....will be used to fund eventual removal of these units to provide for...restoration..." (letter and enclosures to Michael Thabault, USFWS, August 31, 1998). From recent reports of the Trusts' revenues for Wherry Housing, it appears that ample funding for demolition and restoration has already accrued. We are encouraged to see evidence of progress toward the goal of "full demolition by 2010". We concur that full demolition by the original GMPA target date of 2004 (p. 405, DEIS) is probably not currently feasible, since adequate restoration planning and design may require several years.

The DEIS, in contrast, offers a contrasting discussion of "Timing of Wherry Housing Demolition" (p. 404-405, DEIS), stating "The [proposed, agency's preferred] Draft Plan alternative assumes that Wherry Housing is demolished in phases over a 30-year period (one third by 2013, one-third by 2020, and one-third by 2030)...". The origin of this "one third" assumption, and its relation to dune restoration and endangered species recovery, is unclear. We are unable to find reference to it within the PTIP or in correspondence with the Service. Although "Comments...indicated strong support for delaying the demolition", the reason for substituting this protracted demolition schedule for the previous goal of "full demolition by 2010" is unclear (Presidio Trust's Financial Management Plan of 1998). Given the importance of this decision to the recovery of listed endangered species, rigorous evaluation of this decision would be appropriate under a comparison of alternatives under NEPA. Since the presence of occupied or standing residential buildings poses significant constraints on restoration processes and activities adjacent to them (windflow, earthmoving, seed dispersal) delaying removal of up to one third of the rental housing until 2030 could substantially interfere with both interim and long-term ecosystem recovery objectives for San Francisco lessingia. Habitat restoration and subsequent adaptive management may take many years to bring reliable benefits to target species. We therefore recommend that the Presidio Trust suspend commitment to the "one third/2030" schedule in the DEIS, and instead strive to complete demolition of Wherry Housing and restore coastal dune habitats of San Francisco lessingia at the earliest feasible date, in coordination with the National Park Service and U.S. Fish and Wildlife Service.

The impacts of Wherry Housing demolition should be evaluated in an interdisciplinary context. For example, the long-term impacts of gradual, phased demolition over 30 years, versus shorter

schedules, should be evaluated also in the context of impacts on traffic, noise, dust, feasibility of habitat restoration downwind, scenic views, recreational uses, park interpretation, and not just in terms of separate housing, finance, and endangered species concerns.

2. Public Health Services Hospital/Nike Site

The DEIS states that "the PHSH parking area and Nike Missle [sic] Site (above the Nike swale) would be used for landscape vegetation and institutional/residential uses, respectively" (p. 241, DEIS). Mitigation measure NR-10 (p. 259, DEIS) proposes that "Proposed landscape construction and operations at the parking lot and Nike Missle [sic] site would be designed or otherwise conditioned to minimize changes in the local hydrology such that surrounding native vegetation is not affected". The Nike site is located the "upper plateau", and the PSHS on the "lower plateau" (PTIP, p. 116). In contrast with this specific development and land use proposal, PTIP itself (pp. 113-118) proposes only general planning guidelines to "Maintain the historic pattern of concentrating development on the lower plateau while enhancing open space and preserving natural processes necessary to maintain a functioning ecological system on the upper plateau" (p. 116) and to "Rehabilitate and restore the upper plateau as native plant habitat and/or compatible recreational uses consistent with the protection of natural resources"(p. 117). Specific proposals such as those stated in the DEIS are not evident in PTIP, and the compatibility between the general proposal in PTIP and specific proposal in the DEIS is uncertain. We recommend clarifying the relationship between the PTIP and DEIS proposals for this area.

If any part of the upper plateau is converted to landscape vegetation or recreational landscaped areas, it would require irrigation during the growing season and drainage during the rainfall season. Because the existing adjacent, downslope seasonal wetlands depend on the combination of a shallow aquaclude (subsurface layer restricting drainage) and a surficial permeable (sandy) layer to perch groundwater flows from up slope, it is unlikely that adverse impacts of landscaped grounds on wetland hydrology could be mitigated as intended by the programmatic mitigation measure NR-11. By comparison, the preceding mitigation NR-10 proposes a feasibility study for wetland restoration (even though one feasibility study has already been prepared by GGNRA) while NR-11 presumes that mitigation of adverse impacts to existing wetlands at the PHSH is feasible. We are concerned that the land use proposed in the DEIS may adversely impact the adjacent wetlands.

We recommend that the planning guidelines of PTIP (p. 117), for the upper plateau emphasize protection and enhancement of soil and groundwater resources which support the existing seasonal wetlands, as recommended in PTIP (p. 115) as an "ongoing activity". These wetlands, which appear to have originated from grading of pre-existing dunes and underlying bedrock and imported fill, have developed the characteristics of dune slack wetlands, including willow-waxmyrtle groves (a type of riparian wetland vegetation found on the immediate coast) and seasonal wetland grassland. This is the only remnant example of this vegetation on the northern San Francisco peninsula; the constructed dune slack at Crissy Field may develop comparable characteristics over the next several decades. Once widespread within the San Francisco dunes sheet (and Laguna Salada in Pacifica), these seasonal dune slack wetlands have either been

destroyed or converted to ornamental ponds in Golden Gate Park. They have unique geographic conservation value at this location, important values for natural interpretation, and provide an excellent example of how wetland ecosystems re-emerge following regrading and abandonment. The impacts of adversely modifying (by fill or drainage) unique wetlands of the upper plateau should be assessed in terms of Executive Order 11990, 119988, Sec. 2(a)(4) and the NEPA "significance" factors at 40 CFR 1508.27. The ecological significance of these wetlands should be included in the discussion of "affected environment" under "Streams, Lakes, and Wetlands" on pp. 128-129 of the DEIS, where they are only mentioned without reference to their unique importance.

The DEIS also refers more specifically to "the subsurface remains of the cemetery associated with the early history of [the historic Marine Hospital]...largely beneath tan extensive paved court and parking area located on the rise near the northeast corner of the tract" where Army test excavations verified the presence of several burials below nearly 15 feet of rubble (p. 85, DEIS). In contrast, PTIP makes minimal mention of the "former cemetery" (p. 117, PTIP), omits reference to its historic significance or value, and does not expressly incorporate the interpretation and protection of the historic cemetery in its planning guidelines. The DEIS does not identify specific impacts to this historic resource in its discussion of impacts of the site development (described generally in pp. 221-237); instead, it focuses on the impacts of demolition and restoration on cultural resources. We recommend that the impacts of restoration-related activities, and impacts of development, on cultural resources be evaluated equitably. We believe that the preservation and interpretation of the historic Marine Hospital cemetery would be highly compatible with protection and enhancement of existing wetlands and coastal dune scrub, since these would require no adverse modification of subsurface conditions, nor obscure remnant surface topography. Identification of opportunities to maximize integrated conservation of natural and cultural resource values would be highly appropriate for comparison of NEPA alternatives.

3. Crissy Field Wetlands

PTIP and the DEIS are equivocal on the planned expansion of Crissy Field wetlands, and appear to treat this differently from other PTIP elements which involve actions of incompletely evaluated feasibility. It is not clear why PTIP recommends a feasibility study for expansion of Crissy Field wetlands, rather than wetland expansion and enhancement itself (p. 32, DEIS), and why PTIP has made this specific change from the original GMPA premise (p. 24, DEIS). Few or no other habitat-related actions evaluated in PTIP are recommended only for study, and no development actions are recommended only for study or feasibility evaluation. The original feasibility study for a larger wetland at Crissy Field was completed in 1996 by Dames and Moore, with Phil Williams and Associates as subcontractor for hydrological analysis. This comprehensive study, prepared under contract with the National Park Service, determined that a larger wetland area (60 acres) was more feasible than the smallest wetland area evaluated, which was 30 acres. It is noteworthy that the intertidal wetlands actually constructed at Crissy Field are less than 18 acres (almost 16 acres), significantly smaller than the minimum feasible size originally recommended. It is also significant that the constructed wetlands have already

suffered periodic premature choked tidal flows, which were not determined by the project's designers to be a significant risk for many years after construction.

Given the exceptionally high Federal and non-federal commitment of resources toward this wetland restoration, and the positive conclusions of the feasibility analysis already completed, it is not clear why the burden of proving feasibility (or presumption of infeasibility) should be placed on wetland expansion. There appears to be ample justification to presume that expansion of the wetland is both feasible and warranted, even though factors such as cost, logistics, and specific design require further analysis. If the DEIS and PTIP do not presume so, they should explain why feasibility is questioned for this planning action, compared with the many other planning actions which are recommended and presumed to be feasible. We agree that any modification of Crissy Field wetlands would require refinement and revision of past studies and monitoring data (if available), but these should not be interpreted to be barriers to the proposal for wetland expansion and enhancement itself. The DEIS should focus on the discussion of the reasons for appropriateness and compatibility of such actions.

We agree that the relative merits of expanding Crissy Field wetlands to the south (Mason Street and Doyle Drive) or the west (approximate outline of the historic Airfield) should be thoroughly evaluated and compared. The fact that these two areas lie in different federal agency jurisdictions should be no barrier to full evaluation in NEPA: alternatives outside the jurisdiction of the Federal lead agency must be evaluated if they are reasonable and further the purposes of NEPA (40 CFR 1506.2(d); 46 **FR** 18026, as amended, 51 **FR** 15618, 2(a)). Similarly, all relevant, reasonable mitigation that could improve the project must be identified, even if it is outside the jurisdiction of the lead agency (40 CFR 1502.16(h), 1505.2(c)). It would be invalid to presume that such alternatives were unreasonable because no subsequent feasibility study has yet been completed. Since National Park Service is a cooperating agency, we recommend that discussion of alternative designs for an enhanced, expanded Presidio tidal marsh be initiated during the NEPA process for PTIP. The Service would be willing to contribute agency expertise to wetland planning.

The particular resource significance of the Presidio's constructed tidal marsh for endangered species recovery is the rare geomorphic setting and ecological opportunity for a pilot study involving reintroduction of the federally endangered California sea-blite (*Suaeda californica*). The potential habitat for this species is exceedingly limited in San Francisco Bay, and the sandy Presidio salt marsh provides an exceptional opportunity to initiate the recovery of this species in our region. Progress so far on the pilot reintroduction project has been limited. The premature trend of tidal inlet choking and micro tidal lagoon development is likely to reduce the value of this wetland restoration project for the recovery of California sea-blite, and diminishes the achievement of the marsh's original proposed objectives. We believe that marsh expansion, coupled with increased wave-sheltering of the tidal inlet mouth, would be both necessary and sufficient to ensure successful achievement of the original wetland restoration objectives, and promote the recovery of federally endangered species.

4. Fort Scott

The recent rediscovery of the extremely rare and sensitive population of San Francisco owl's-clover (*Triphysaria floribunda*) in the rough serpentine soil "lawn" adjacent to the Log Cabin presents a significant new context for evaluation of land use alternatives in the Fort Scott District. It illustrates that the concept of "landscaped areas" and "natural vegetation" must not be interpreted rigidly. This population and restoration of its habitat is mentioned briefly in PTIP (p. 111), but the precedent and its significance is not reflected in the DEIS evaluation of alternatives. We recommend that the discussion of alternatives and environmental consequences includes specific reference to this and similar "cryptic" habitats, particularly surface or near-surface exposures of serpentine soil or rocks.

5. Assessment of Executive Order 13112 and National Historic Preservation Act (NHPA)

The recent Executive Order (EO 13112) on invasive species was appropriately included in the DEIS chapter on "consultation and coordination". Some of this Executive Order's most important consequences for the Presidio, and for NEPA obligations to reconcile unresolved policy conflicts which affect alternative uses of resources, however, have not yet been fully addressed. The Presidio's non-native tree plantings ("cultural forests") are cultural resources (NHPA, and Department of Interior policies for its application to landscaped areas), wildlife habitat, and invasive species populations. The Presidio Vegetation Management Plan omitted direct analysis of how to reconcile the conflict between the Trust's duties in the context of Executive Order 13112 to treat the trees as biological threats, and the obligation to protect them as cultural resources subject to NHPA procedures and obligations.

We believe that the EIS process would be an appropriate forum to treat or outline the resolution of potentially conflicting resource conservation policy mandates. NEPA includes specific obligations for Federal agencies to "review their present statutory authority, administrative regulations, and current policies and procedures for the purpose of determining whether there are any deficiencies or inconsistencies therein which prohibit full compliance with the purpose of this Act [NEPA], and shall propose.....such measures as may be necessary to bring their authority and policies into conformity with...[NEPA] (NEPA Sec. 103 (42 USC Sec. 4333; 40 CFR 1500.6). Since the basic purpose of NEPA is to improve and coordinate Federal plans, functions, programs, and resources (42 USC Sec. 4321, Sec 4331), it would be appropriate for the DEIS to fully evaluate this apparent conflict among disparate resource mandates. The Council on Environmental Quality has provided general guidance on how Federal agencies should apply NEPA to conflicts among proposals and land use policies or plans (46 Fed. Reg 18026 (March 23, 1981) as amended, 51 **FR** 15618)

The approach of the Presidio Vegetation Management Plan (VMP) was to designate map units of relatively static, noninteracting adjacent patches of non-native trees (historic "forest) and native plant communities for perpetual maintenance. This approach has limitations because of physical and biological interactions between these vegetation types (wind-shelter "shadows", shading, fog-drip, nutrient augmentation, leaf litter deposition, and seed dispersal) and adjacent habitat.

The impacts of nonnative trees on native plant communities (including all endangered plant species habitats) are greater than those of landscaped plantings in intensively developed portions of the Presidio because of the degree of contact (edge), and the composition of nonnative speci in the arboricultural areas. PTIP provides an opportunity to revisit the planning principles of the VMP in light of Executive Order 13112 and NHPA, minimizing their conflicts by: (1) consolidation of highest-priority stands; (2) cultivation of buffer plantings (including compatible regionally native evergreen trees) to minimize adverse interactions between arboricultural and native vegetation; (3) compensatory replacement and relocation of lower-priority stands in area which enhance the value of preserved, highest-priority stands.

It would be appropriate to note in the DEIS that the NHPA, like NEPA itself, has been interpreted consistently in case law to be an essentially procedural environmental law, with no substantive prohibitions on Federal actions. Like NEPA, it has procedural requirements, policy obligations, and advisory policies affecting the discretion of Federal agencies. In this respect, it contrasts with the substantive prohibitions of the Clean Water Act and Endangered Species Act This is explained somewhat indirectly in the text of the DEIS, and the implications for planning and mitigation, particularly in the context of the Presidio Vegetation Management Plan and similar plans, is not explicit. This is significant, because if the Trust has developed, or is developing, agency-specific mitigation policies regarding cultural resources, these policies should be subject to NEPA review pursuant to 42 USC Sec. 4332, 40 CFR 1500.6.

6. Endangered Species Act

The DEIS discussion of the Endangered Species Act (ESA) in the chapter on "Consultation and Coordination" adequately addresses the "consultation" aspect of ESA, but does explain the role of consultation in the context of the larger purposes of ESA. We recommend that the FEIS identify explicitly the principal mandate of endangered species recovery as the underlying purpose of interagency coordination. While Section 7, and the prohibition against Federal actions jeopardizing endangered species, reduce the chances of extinction, the affirmative conservation obligations of all Federal agencies, and the preeminent role of endangered species recovery, should be explained as central goals ESA. Please note that the 1988 amendments to ESA stressed the primacy of the ecosystems on which endangered species depend.

The Presidio provides a variety of habitats which support federally listed species including, but not limited to, the endangered Raven's manzanita, Presidio clarkia (*Clarkia franciscana*), San Francisco lessingia, California sea blite (*Sueda californica*), and the threatened Marin dwarf flax (*Hesperolinon congestum*) all of which are protected pursuant to the ESA. Implementation of any of the proposed alternatives may result in adverse affects to these species. As stated in section 7(a)(1) of the Act, all Federal agencies shall, in consultation with the Service, utilize thei authorities in furtherance of the purposes of the Act by carrying out programs for the conservation of endangered and threatened species. Therefore, initiation of formal consultation between the Trust and the Service pursuant to section 7 of the act is required. Such consultation would result in a biological opinion addressing anticipated effects of the project to listed and proposed species and may authorize a limited level of incidental take.

III. Technical comments

1. Early historic dune ecosystem

The DEIS described the pre-Colonial landscape of the Presidio as "mostly barren sandy hills with low shrubs and grasses, and pockets of laurel trees", citing NPS documents. This is only partially correct. The dunes consisted of distinct sheets of older, stable dunes with soils, shrubs, local groves of dwarfed trees, and grassland, and separate mobile, largely unvegetated young dunes. The mobile bare dunes prevailed west of Ocean Beach and west of Black Point (now the Marina); much of the Presidio supported mature dune vegetation. This is significant in the context of dune restoration as there is a profound difference between restoration of young mobile dunes and old stable dune vegetation and soils, particularly in an urban park context. Bay laurel trees are riparian vegetation, and were found abundantly along the base of the bluffs east of Fort Point (behind Presidio Marsh), and presumably in along some creeks.

2. Raven's manzanita

Please note that the single natural surviving individual of Raven's manzanita was rediscovered by Peter Raven in the early 1950's, and was quite mature at that time. Therefore, it is considerably more than "over 30 years old" (p. 106, DEIS). It is likely that the plant is the same one observed in the 19th century, since slow-growing manzanita in harsh environments may be very long-lived.

3. San Francisco lessingia

Contemporary San Francisco lessingia localities include the Presidio golf course roadside, Marine Hospital (PHSH), Battery Caulfield road, Lobos Dunes, Wherry/Feral dunes, Rob Hill, Crissy Field, and Hillside Park (Daly City). Depending on whether each locality is interpreted as population, which would be reasonable from a demographic perspective, there are currently more than 6 populations. Note that this species does not itself require "specific aspect....elevation...slope..." etc., but requires the specific micro environments, dune dynamics and vegetation structure that these conditions maintain. The geographic uniqueness is the result of the narrow native range of the species, and the exceedingly small areas of potential habitat left within it.

4. Historic and recent tree stands

The DEIS should state, in all relevant contexts, the dual aspects of nonnative trees as historic/cultural resources, and invasive alien species subject to Executive Order 13112. The significance of this ambivalent status is lost when the same trees are discussed in separate sections or discussions focusing on natural or cultural resources (such as p. 79). The criteria for distinguishing "historic" arboricultural plantings, and "non-historic" (spontaneously established trees of relatively recent origin) should be explained. Factors such as landscape setting, independent of tree age, should be identified if relevant. If distinctions exist in the relative

importance of "historic forest" stands, or non-historic trees, they should be explained and distinguished graphically. Figure 23 instead shows all current tree "resources", without distinction of type, status, or relative importance.

5. Impacts of dune restoration on cultural resources and scenic views

The discussion of "Important Views" (p. 131, DEIS) and corresponding discussions in sections on alternatives and environmental consequences (pp. 267-270, DEIS), should explicitly relate dune habitat restoration and impacts on scenic or important views, identifying joint benefits. The visual, recreational, and interpretive aspects of dune restoration should be more explicitly and rigorously evaluated, particularly where views of the Golden Gate are relevant.

There is some imbalance between the DEIS's treatment of beneficial impacts of site-specific dune restoration on non-biological resources such as visual resources and the assessment of "high potential to impact" archaeological resources due to "expansion of native plant habitat" (p. 234, DEIS). The relationship is identified only generally, and only in the context of tree removal rather than dune restoration. The DEIS does not explain how adverse impacts to archaeological sites would result from "shifting dunes" (p. 234). Most dune systems in California contain multiple shell middens, which are exposed by dune transgression, and are preserved by dune burial. We are aware of no State or National parks which have identified dune mobility as a threat to their archaeological resources, buried or otherwise. Shoreline retreat (bluff erosion) does have the potential to threaten archaeological resources, but this should not be confused with dune mobility. Please note that no dune restoration proposed or considered for the Presidio includes "shifting dunes", which would be incompatible with endangered species recovery. We do acknowledge that grading activities performed in removal of degraded surface soils and trees has the potential to impact unidentified buried archaeological resources. It would be instructive for the EIS to explain, however, why demolition of buildings within original footprints (p. 234) would be less of an impact to archaeological resources than stump removal and surface soil scraping.

This concludes the Service's comments on the PTIP DEIS. We look forward to the successful finalization of the EIS and PTIP, and our continuing cooperation in land use planning and management in the unique Presidio environment. Our staff remain available to the Presidio Trust for technical support during the finalization of these planning documents.

If you have any questions regarding ESA consultation, please contact Don Hankins at (916) 414-6625. If you have any questions regarding endangered species recovery, please contact Peter Baye at (707) 562-3003.

Sincerely,

Jan C. Knight
Chief Endangered Species Division

cc:
Sandy Morey, California Department of Fish and Game
Brian O'Neil, Superintendent, Golden Gate National Recreation Area
Marc Albert, Golden Gate National Recreation Area
Daphne Hatch, Golden Gate National Recreation Area
Environmental Protection Agency, Region IX

STATE OF CALIFORNIA - BUSINESS, TRANSPORTATION AND HOUSING AGENCY GRAY DAVIS, Governor

DEPARTMENT OF TRANSPORTATION
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September 24, 2001

SF-101-8.44
SF101120

Mr. John Pelka, NEPA Compliance Manager
The Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Dear Mr. Pelka:

Draft Environmental Impact Statement (DEIS) for the Draft Presidio Trust Implementation Plan (PTIP); The Presidio Trust; City & County of San Francisco

Thank you for including the California Department of Transportation (Department) in the environmental review process for the above referenced project. We have examined the DEIS and have the following comments:

1. The PTIP DEIS build alternatives are predicated on the assumption that direct access will be provided from Doyle Drive to the Presidio. The San Francisco County Transportation Authority (SFCTA) in cooperation with the Department and the Federal Highway Administration (FHWA) is in the process of preparing a Draft Environmental Impact Statement/Report, which includes build alternatives which would replace Doyle Drive and provide direct Presidio access. However, a Doyle Drive replacement alternative has not yet been selected; nor is there currently capital funding in place for the project.

   We would, therefore, recommend that the PTIP address the traffic and environmental consequences on Route 101 of (1) a protracted period where there is no direct access via Doyle Drive; (2) a selected alternative that does not provide direct access to the Presidio. While SFCTA, the Department and the FHWA recognize the importance of access to the Presidio from Doyle Drive and are diligently working to advance the Doyle Drive project and identify funding, it could be that implementation of a replacement project could be some years in the future.

2. Finally, should there be a need to perform any work or traffic control within the State right-of-way (ROW), please note that such activities will require an encroachment permit. To apply for an encroachment permit all applicants are required to submit a completed application with appropriate environmental documentation and five (5) sets of plans (in metric units) which also show State ROW to the following address:

Mr. Sean Nozzari, District Office Chief
Office of Permits
Caltrans, District 04
P. O. Box 23660
Oakland, Ca 94623-0660

Should you require further information or have any questions regarding this letter, please call Nandini N. Shridhar, AICP, of my staff at (510) 622-1642.

Sincerely,

RANDELL H. IWASAKI
Acting District Director

By Jean C.R. Finney

JEAN C. R. FINNEY
District Branch Chief
IGR/CEQA

October 25, 2001

BY MAIL AND FACSIMILE: (415) 561-2716

GOLDEN GATE BRIDGE
HIGHWAY & TRANSPORTATION DISTRICT

Mr. John Pelka
NEPA Manager
The Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Dear Mr. Pelka,

Re: **Presidio Trust Draft Implementation Plan**
Presidio Trust Draft Environmental Impact Statement

Golden Gate Bridge, Highway and Transportation District (District) staff has reviewed the above referenced documents and provides the following comments as they pertain to impacts on the Golden Gate Bridge, Golden Gate Transit (GGT), and District properties and operations.

District operates and maintains the Golden Gate Bridge. District also operates traffic lane configurations on Doyle Drive from the Golden Gate Bridge toll plaza to off-ramps leading to the Marina District and Richardson Avenue. GGT buses serve City of San Francisco with commute and basic public transit services, connecting the Financial District, Civic Center, and intermediate neighborhoods with Marin and Sonoma counties. Golden Gate Ferry offers 42 daily trips between downtown San Francisco and Larkspur and 20 trips between San Francisco and Sausalito. Any potential impact to these facilities and services should be adequately disclosed in the Draft Environmental Impact Statement.

Presidio Trust Draft Implementation Plan (PTIP)

General Comments: PTIP lacks detail on the specific transportation improvements that are needed to support Presidio land use proposals. PTIP also lacks detail on how it will incorporate in its transportation and land use plans the challenges and opportunities of its proximity to the Golden Gate Bridge.

Specific Comments:

1. PTIP maps do not consistently show District buildings near the Golden Gate Bridge. Please refer to District facilities and jurisdiction lines within the Presidio Areas A and B accurately in the report text and images (page vii).

1011 ANDERSEN DRIVE • SAN RAFAEL, CA 94901-5381 • USA

2. In the *Introduction* and description of *Presidio Today*, there is little mention of the Golden Gate Bridge, Doyle Drive, and Highway One adjacent to and traversing the Presidio. These facilities provide access to and through the Presidio, and should be mentioned (page 9).

3. Following historic development patterns, higher population densities are proposed for the north end of the park near transit stops (page 14). As one of the public transit operators through the Presidio, the District would like to be advised and involved with specific future residential and commercial development projects as they are planned.

4. Principle 3, *Wetlands*, states that the Presidio Trust would evaluate the expansion of Crissy Field marsh. Environmental resource goals may compete with transportation, housing, and other goals. While Doyle Drive is listed as a factor on this evaluation, it may be more accurate to present it as a constraint since it is a vital facility (page 26).

5. Principle 11 describes Presidio *Visitor Orientation* (page 39). It is suggested that information kiosks and signs be multi-lingual. This should include transit information signs.

6. Principle 12, *Lodging*, describes accommodations that are close to transit and do not necessitate use of private automobiles. Is this part of a transportation demand management (TDM) plan (page 40)?

7. Principle 15, *Residential Community*, states that there are approximately 1,650 housing units in the Presidio. The PTIP would "cluster" the housing close to work and major activities. How will the circulation needs of residents be met? It is projected that approximately 7,200 employees will work at the Presidio within the next 20 years. How will they access their jobs (page 43)? Will the internal shuttle, bicycling, and walking be the primary modes of transportation for internal trips?

8. Principle 17, *Multi-modal Transportation Systems* (page 46), and Principle 18, *Alternative Transportation Opportunities* (page 47) – There are many references to improving transit to meet the PTIP's transportation needs. What improvements are specifically contemplated? How will these improvements be funded?

9. Principle 19, *Public and Internal Transit*, focuses on public transportation systems linked to the Presidio. The internal shuttle is currently in service. The PTIP should include ways to increase use of the internal shuttle. It is also mentioned that the Trust will study the "feasibility of increasing access to GGT buses traveling to/from downtown." How does the Trust plan to do this?

The PTIP makes reference to a transit hub proposed for the Main Post. There have been recent discussions between the Presidio Trust, GGT, and Muni to locate another hub at or near the Golden Gate Bridge. PTIP should acknowledge this effort. GGT should be included in the plans to locate the transit hubs in the Presidio (page 91).

10. Principle 20, *Regional Public Transit Improvements, Tour Buses* – The District would like to review proposed increases in tour bus routes and of changes in the use of the Golden Gate Bridge Viewing Area as any increase in frequency of use may further aggravate traffic capacity and congestion in this location.

    Water Taxi/Ferry – PTIP should reference the San Francisco Ferry Terminal as a potential water taxi/ferry connection point for the Presidio as it serves as a base for Golden Gate Ferry and other regional ferry services (pages 50, 96).

11. Chapter 4 describes Planning Concepts for each Presidio "District" and its Access and Circulation. Fort Scott discussion lacks substantive discussion of Golden Gate Bridge facilities. The proposed "institutional" land use theme for Fort Scott does not have the appearance of being compatible with Bridge operations and maintenance support activities. The PTIP should provide an explanation of how it will address the recommendations of the NPS General Management Plan to relocate Golden Gate Bridge facilities to Fort Scott. The Golden Gate Bridge is a significant landmark and attraction to visitors in the Presidio that merits focused attention in the PTIP. It is also an essential component of the park's transportation infrastructure. Its operating and maintenance needs should be fully met and integrated in the PTIP. This is particularly relevant to the seismic retrofit of the Golden Gate Bridge, a critical project that would have immense impact on the Presidio if not completed expeditiously.

    The Golden Gate Bridge Seismic Retrofit Project is currently ongoing. Previous to the creation of the Presidio Trust, in preparation for this long-term project, the District received a Special Use Permit from National Park Service (NPS) that included the use of three parcels of land near Lincoln Boulevard. The federal government directed the Bridge District in the Special Use Permit to use these three parcels as the construction staging area for the seismic retrofit work. The Presidio Trust is the successor agency to the NPS for these three parcels. The five-year permit expires December 31, 2001; however, it includes a renewal clause for the extension of the permit in its entirety. The District is currently working with the Presidio Trust to continue to use these three parcels for the Seismic Safety Project. It is important that this ongoing use by the Seismic Safety Project be addressed in PTIP.

12. Under the Letterman Planning Guidelines there is no mention of transit services, stops, or hub. Plans to provide transit and alternative transportation access to the Letterman area should be referenced (or acknowledged) in the PTIP.

13. Table 5.2 shows the 5, 10, and 20 year outlook for Presidio development. District requests to remain informed as these projects are implemented, as their potential impacts affect traffic flow on the Golden Gate Bridge and Doyle Drive, and GGT bus and ferry services (page 137).

14. Appendix D lists and describes overall TDM goals. How will the goals of internal trip reduction and average vehicle occupancy and reduction of parking be monitored and tracked? How does the Presidio Trust expect to "secure" increased GGT increasing services to the park? Please include the District in development of TDM.

Presidio Trust Implementation Plan Draft Environmental Impact Statement (DEIS)

General Comment: PTIP represents a significant change to land use in close proximity to Golden Gate Bridge and GGT bus routes. While it is understood that this programmatic DEIR cannot address all the District's concerns for the impacts of new development and land use restrictions within the Trust jurisdiction, it is clear that further discussion and cooperation is necessary to assure that the Golden Gate Bridge and GGT can function effectively within the park.

Specific Comments:

1. Figure 31, *Transportation and Circulation* (page 195) should add Golden Gate Transit bus routes and existing Presidio bus stops for completeness.

2. Table 30, *Nearby Muni Transit Lines* (page 197). A similar table showing nearby Golden Gate Bus Route information should be added.

3. Table 32, *Golden Gate Transit Bus Passenger Loads – 2000* (page 200), illustrates the passenger load for GGT bus routes crossing the Golden Gate Bridge.
   Please add to the table:
   - Route 60, which, like the Route 70, is part of the Route 80.
   - Route 3, a Sausalito Ferry shuttle, does not cross the Golden Gate Bridge into San Francisco.
   - Northbound morning Route 80 and Route 90 appear to have low load factors.
   - Route 93, a Civic Center shuttle, has been extended and now originates at the Manzanita park-and-ride lot near Mill Valley.
   - Route 50 has high Marin County local use, so the load factor listed in the table may be misleading.

- Valley of the Moon Commuter Club, a club bus from the City of Sonoma, crosses the Golden Gate Bridge and picks up a club member two to three times a week at the southbound Toll Plaza bus stop.

4. *The Presidio Internal Shuttle* (page 201) section needs to be updated to include information on the initiation of the Presidio shuttle and its current routing. If there is any data available on shuttle ridership it should be added as well.

5. Figure 32, *Existing Bicycle Routes Serving the Presidio Area* (page 203) – Please note that bicycle paths across the Golden Gate Bridge are shared with pedestrians on weekdays (East sidewalk) and are separate from pedestrian traffic on weekends (West sidewalk).

6. In Section 4.5, *Transportation and Circulation* (page 318), *Presidio Live/Work Model* assumes that "most of the employed residents living within Presidio would also work within Presidio." What proportion does "most" represent? Is this a fair worst case scenario? The three bullet points appear to be quite optimistic.

7. Section 4.5.1, *Roadway Network* (page 319) – Please note that any proposed changes to GGT routes accessing the Presidio will have to be evaluated by District staff and may require additional analysis.

8. *GMPA 2000 Alternative* (page 323) – Although this alternative includes the Lincoln Avenue/Golden Gate Bridge Viewing Area, the list of intersections that would operate at an unacceptable level of service under this alternative does not include the Bridge Toll Plaza. Is this area included in the intersection mentioned above?

9. On page 328 it is mentioned that the Presidio Trust has evaluated impacts "outside" the Trust's jurisdiction (example given is intersection of 14th Avenue and 25th Avenue). However, little mention is made of Golden Gate Bridge Toll Plaza.

10. Appendix F, Transportation Appendix Table 6, *2020 Golden Gate Transit Bus Peak Hour Presidio Ridership* (page F-11), does not summarize GGT routes. Please add a table similar to Table 5 showing more detailed route information. Please note that Table 6 assumes that for the morning northbound trips and the afternoon southbound trips on GGT, people arriving from the Presidio are able to board Golden Gate buses to get to Financial District and to the Civic Center areas. Transport of local San Francisco passengers by GGT is currently permitted only at bus stops located at the Golden Gate Bridge to avoid duplication of Muni service..

11. *GMPA 2000 Alternative* (page 335) states that the increase in ridership projected could be absorbed by all but five of the existing 26 GGT bus routes that serve the Presidio. What are the impacts to the remaining five GGT routes?

12. All of the alternatives listed offer mitigation, "monitoring of GGT routes and coordinating with GGT" as means of decreasing their "impacts" on Golden Gate Transit. What type of impacts is the Presidio assuming? How will this monitoring take place and by whom? How does "monitoring" mitigate an impact?

13. Section 4.55 *Construction Traffic* describes the streets and gates that construction vehicles are most likely to use, as well as the Construction Traffic Management Plan developed to minimize traffic impacts. What impacts, if any, are expected from the increase in construction vehicle traffic near the Golden Gate Bridge Toll Plaza?

14. TR-6 *Lincoln Blvd./Golden Gate Viewing Entrance Intersection* – On page 340, reference is made to "Installing a left-turn lane on the southbound approach from the Golden Gate Viewing Area as an interim improvement, and signalize the intersection as a final improvement." Since this area is located on the boundary between Area A and Area B, DEIS states that the cost of the improvement should be shared by Presidio Trust, National Park Service, and District. Why would the District be financially responsible for this PTIPmitigation?

15. TR-7 *Lincoln Blvd./Merchant Road Intersection* (page 340) – Per Table 46, Lincoln Boulevard/Merchant Road intersection currently operates at level of service "A." Proposed mitigation would bring this intersection to level of service "C" or "D." Can the DEIS identify further measures to improve traffic operations at this intersection?

The District appreciates the opportunity to comment on this project. Please call Principal Planner Maurice Palumbo at (415) 257-4431 or Associate Planner Pascale Soumoy at (415) 257-4490 should you have questions.

Very truly yours,



Alan R. Zahradnik
Director of Planning

ARZ:gj
c: Celia G. Kupersmith
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STATE OF CALIFORNIA GRAY DAVIS, Governor
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October 23, 2001

John Pelka, NEPA Compliance Manager
The Presidio Trust
34 Graham Street, P.O. Box 29052
San Francisco, California 94129-0052

SUBJECT: Presidio Trust Draft Environmental Impact Statement for the Presidio Trust Draft Implementation Plan

Dear Mr. Pelka,

The San Francisco Bay Conservation and Development Commission ("BCDC") appreciates the opportunity to comment on the Presidio Trust Draft Environmental Impact Statement ("EIS") for the Presidio Trust Draft Implementation Plan ("PTIP"). Although the Commission has not had the opportunity to review the EIS and therefore these are staff comments, they are based on the Commission's federally-certified Coastal Management Program which includes the *San Francisco Bay Plan* ("Bay Plan") and the Commission's law, the McAteer-Petris Act. BCDC's Management Program supports the Trust's goals to increase open space and recreational opportunities, preserve historic resources, rehabilitate native vegetation and riparian areas, preserve and enhance Bay views, protect water quality, establish a network of trails and bikeways through the Presidio and encourage public transportation through transportation demand management strategies.

As the coastal management agency for the San Francisco Bay, BCDC is responsible for ensuring that activities that occur within the coastal zone are consistent with the coastal zone management program for San Francisco Bay. The Bay Plan establishes policies to guide development in and around San Francisco Bay. The Bay Plan designates the Presidio as a park priority use area and includes as a policy, "If and when not needed by the Army, retain at least shoreline and undeveloped areas as a regional park."

San Francisco Bay Plan Policies. Under the Coastal Zone Management Act, federal agencies are generally required to carry out their activities and programs in a manner consistent with the Commission's coastal management program. To implement this provision, federal agencies make consistency determinations on their proposed activities and applicants for federal permits, licenses, other authorization or federal financial assistance make consistency certifications. The Commission then has the opportunity to review the consistency determinations and certifications and to either concur with them or object to them. The Presidio project is a federal development project located

within the coastal zone and therefore, must be consistent to the maximum extent practicable with the coastal management program. A project that affects land or water uses that requires a federal permit, license, or other authorization or a state or local project that affects land or water uses that is supported by federal assistance must comply with and be conducted in a manner that is fully consistent with the coastal management program.

The EIS for the Presidio Trust Implementation Plan contains a discussion of the approved plans affecting the Presidio property. The EIS lists the *Presidio General Management Plan Amendment* and the *City and County of San Francisco General Plan.* However, the EIS does not include the *San Francisco Bay Plan* as an approved plan with policies affecting the Presidio. The *San Francisco Bay Plan* designates the Presidio as a park priority use area and states that the shoreline and the undeveloped areas in the Presidio should be retained as a regional park. Additional policies that could affect the Presidio include policies pertaining to the location of commercial uses within recreation areas. One such policy states, "Limited commercial recreation facilities, such as small restaurants, should be permitted within waterfront parks provided that they are clearly incidental to park use, are in keeping with basic character and do not obstruct public access." The Bay Plan also contains a Commission suggestion to explore the possibility of a scenic transit system from Ocean Beach to China Basin. A discussion of the Bay Plan and the relevant policies should be added to the EIS discussion of approved plans which contain policies that affect the Presidio.

The EIS states on page 150 that "The Presidio is under exclusive federal jurisdiction, therefore it is not directly subject to state and local land use plans, policies or regulations." This sentence should be modified to include a discussion of the Coastal Zone Management Act , the Bay Plan and the consistency determination process.

In discussing the consultation and coordination that was done during the preparation of the PTIP, the EIS mentions consulting with BCDC. The EIS describes this consultation on page 400, "The BCDC stated that the plan update could affect the coastal zone. The primary concerns were whether the PTIP would be consistent with the Presidio's Park Priority Use designation for Area B; and whether sufficient public access would be provided through the Presidio and from destinations within the Presidio to the shoreline." This sentence should be corrected to read, "The BCDC stated that the plan update could affect the coastal zone. The primary concerns were whether the PTIP would be consistent with ***BCDC's*** Park Priority Use designation for ***the Presidio***; whether sufficient public access would be provided through the Presidio and from destinations within the Presidio to the shoreline and whether large commercial development is consistent with the park priority use designation."

The section of the EIS which includes a description of the Coastal Zone Management Act on page 414 of the EIS includes the statement, "The agency's (BCDC's) concerns with actions that affect public access, recreation opportunities, vegetation management and site remediation have been addressed in this EIS." BCDC has not had the opportunity to review the EIS until this time and therefore has not made the determination that the EIS addresses its concerns regarding public access, recreation opportunities, vegetation management and site remediation. While the EIS addresses these issues, it does not necessarily address all of BCDC's concerns regarding these issues, such as trails and public access, parking, building square footage, proposed uses and natural resources.

Trails and Public Access to the San Francisco Bay. Although the PTIP and the EIS both refer to the Presidio Trails and Bikeways Master Plan, neither the PTIP nor the EIS contain any figures depicting proposed or existing trails. One of the most significant issues for BCDC is the adequacy of the public access provided through the Presidio from both surrounding neighborhoods and from areas within the Presidio to the San Francisco Bay. As the EIS states on page 201, "The Presidio does not have a continuous system of sidewalks, bicycle trails and bicycle lanes. Sidewalks and marked pedestrian crossings are provided sporadically throughout the Presidio. In many cases within the Presidio, pedestrians and bicycles must mix with vehicles on the street system to move from one area to another." Implementing the land use proposals described in the PTIP will result in an increase in automobile traffic, making the current conditions of the trails on the Presidio and access to San Francisco Bay more difficult and dangerous. The trails system, like the automobile roadways, is an integral component of the circulation system. The development of roadway circulation and land use plans are incomplete without the inclusion of the trails system. The PTIP should include the existing trails on Figure 2.2 Existing Scenic Views and Active Recreation Resources and both existing and proposed trails on the concept plans for the planning districts. Alternately, an additional figure depicting the existing and proposed trails could be added to the PTIP and the EIS.

The concept plan for the Crissy Field Planning District appears to include two proposals for linking pedestrians and cyclists to the shoreline. The first proposal would be along Tennessee Hollow and the second would connect the Main Parade Ground to the shoreline. BCDC supports these connections and would encourage the Presidio Trust to find more locations for additional links. There appears to be no planned link between the interior Presidio lands and the shoreline west of the Main Parade Ground. The addition of such a link west of the Main Parade Ground should be included in future plans unless existing topography would make such a connection prohibitively expensive. The additional links could be particularly important for reducing impacts to wildlife since one of the proposed links is also planned to serve as the main north–south wildlife corridor and both connect to the south of the Crissy Field Marsh. Providing additional pedestrian and bicycle linkages to the Bay could reduce the impacts on wildlife using the Tennessee Hollow corridor by reducing the number of people required to use this corridor in order to get to the Bay.

The PTIP and the EIS should include policy guidance to indicate what type of trails are contemplated for the Presidio. This could include general widths and amenities, proposed signage systems, possible surfaces and other proposed features such as park furniture, landscaping, lighting, etc.. Since this information is probably included in the *Presidio Trails Bikeways and Master Plan*, the PTIP could simply list the appropriate attributes and refer readers to the Master Plan for more specific information. This information would allow reviewers of the draft plan to determine the adequacy of proposed path widths and surfaces adjacent to sensitive resources and the appropriateness of the amenities proposed along these corridors. It will also assist reviewers in determining whether the proposed system would provide a safe and enjoyable experience for users.

The EIS states on page 333, "Under the Draft Plan alternative, there would be up to 18,500 bicycle and pedestrian trips per weekday, 54 percent more trips than under the GMPA 2000 alternative." Is this increase due to policies that are included in the trails master plan or the policies described in the PTIP? What contributes to this significant increase in bicycle and pedestrian trips over the trips estimated in the GMPA 2000?

Parking. On page 40, the EIS states, "Changes in the configuration of the parking supply (10,830 spaces) would be the subject of future planning. Parking would be designed to serve primary activity centers, managed to reduce impacts on the park's natural, historic and recreational features, to protect its open space qualities, and to avoid parking problems in adjacent city neighborhoods and along Crissy Field." What process will be developed to determine the location of the parking supply? How will parking and traffic be designed and located to avoid recreation and resource areas? The location of over 10,000 parking spaces is a significant land use issue and should be resolved during the PTIP process or the PTIP should include specific policy guidance to inform the future planning process.

The EIS describes the number of proposed parking spaces on page 331 stating, "The result would be a surplus of 1,660 spaces or 21 percent more than the estimated average of weekday demand." As the EIS points out, this will encourage people to drive rather than take public transportation, making it more difficult to achieve transportation demand management goals. Although it is important that adequate parking be provided to ensure that traffic and parking impacts do not affect surrounding neighborhoods and the recreational and natural resources in Area A, it is also important to achieve high ridership on public transit and reduce automobile traffic. Strategies to reduce the available parking, such as reducing the amount needed by developing shared parking among uses with different peak demand times or reducing the amount of parking available by closing some of the parking areas until needed for special events might assist the Trust with meeting both transit and parking goals. Special event parking might also incorporate turf block or other such surface to minimize surface runoff and aesthetic impacts of such a significant amount of parking.

The PTIP and the EIS include charging fees or implementing time limits for parking at the Presidio as possible transportation demand management strategies. While these are appropriate strategies for reducing automobile usage, they can result in an increase in parking impacts in adjacent areas. Parking for the Presidio Area B uses should not negatively impact the recreational and natural resources in Area A. It may be necessary to include the same fees and/or time limits in both areas to ensure that Area A does not receive significant additional traffic and parking impacts from those seeking to avoid the fees and/or time limits implemented in Area B.

Building Square Footage. Although the PTIP proposes to reduce the building area in the Presidio overall, the plan proposes to increase the square footage in the Crissy Field and Fort Scott Planning Districts. The plan proposes an increase of up to 80,000 square feet in the Crissy Field Planning District and up to 100,000 square feet in Fort Scott. These two planning districts have the majority of the sensitive vegetation and habitat areas and are adjacent to significant recreational resources along San Francisco Bay- Crissy Field (Area A) and Baker Beach. The increased square footage should be designed so that it does not result in visual or physical barriers to San Francisco Bay, in adverse impacts on sensitive Bay–related habitats or species or on recreational uses of the Bay shoreline.

As land use intensities increase and a more diverse mix of land uses are introduced to the Presidio, there is a greater chance that recreation and habitat areas will be negatively impacted by additional traffic, noise, light and overuse. These impacts might be harder to avoid with additional square footage being added to Crissy Field and Fort Scott, particularly if these increases reduce the amount of land available for buffers, recreational areas, additional open spaces and viable wildlife linkages. In order to avoid these impacts, the Trust should try to increase density where development exists and attempt to reduce the development footprint by removing some of the non–historic buildings in these planning districts. This would result in more land available for open spaces, recreation, buffers and wildlife corridors and could improve visual character, increase the viability of public transit and reduce auto traffic. However,

if it is determined that the additional square footage is necessary, then the development should be planned to avoid impacting the recreational and natural resources along the San Francisco Bay in Area A. This includes locating adequate parking and open space in these planning districts, using best management practices to avoid negatively impacting the water quality of the Bay and ensuring that additional lights and noise will not have an adverse impact on Area A.

Proposed Uses in Fort Scott and Crissy Field Planning Districts. The EIS states on page 292, "Increased visitor-oriented uses in the Main Post and Crissy Field Planning Districts would attract more visitors to the bayfront area of Area A. Introducing active visitor-oriented uses adjacent to a relatively passive recreation area could conflict with resource goals for the recently restored Crissy Field marsh (Area A). Mitigation requiring monitoring of Area B uses and coordination with the NPS to ensure that proposed uses compliment Area A, would minimize potential impacts." The PTIP proposes land uses for Crissy Field (Area B) that include museums, recreation with visitor amenities such as lodging and cafes and cultural/educational facilities. These land use descriptions are broad and should be further refined in order to avoid the location of incompatible uses and intensities adjacent to the existing public use areas and sensitive natural resources located north of Doyle Drive. Further refinement could include definitions and criteria for each use or maximum square footage requirements or limits on the number of rooms per lodging facility.

In establishing the land use preferences, did the Trust research commercial uses in or adjacent to recreation areas in order to select appropriate uses and intensities? The EIS describes part of the mitigation as including the monitoring of Area B uses for impacts to Area A. What would this monitoring consist of and what would be the result of the monitoring if it was determined that Area B uses were negatively impacting Area A? Will leases for the properties within the Crissy Field Planning District include a discussion of such mitigation and contain descriptions of potential actions that may be taken if uses in Area B are negatively impacting Area A?

Natural Resources. The EIS describes the potential impacts of the PTIP on natural resources on pages 241–242, "Under the Draft Plan alternative, there would be an increase in the number of project Presidio residents, visitors and employees. Overall the Draft Plan alternative would result in a more intensive use of the Presidio by the public and that could indirectly affect the health of native plant communities, specifically the viability of sensitive habitats within PHSH, East Housing and Crissy Field Planning Districts. This could result in the increased potential for fragmentation, loss of natural processes or disturbance to native plant communities, and have reduced ecological benefits compared to those defined under the GMPA 2000 alternative." In order to reduce these impacts, the building area proposed in these districts could be reduced to allow for more open space, expanded riparian areas and for the expansion of Crissy Field marsh into Crissy Field Area B. In order to avoid fragmenting the natural areas, the PTIP could specify minimum widths for wildlife corridors, buffers and habitat areas. Additionally, specific policies to reduce light and noise impacts could be included in the PTIP and the property leases to minimize impacts on sensitive resources. Viable corridors and appropriate buffers would reduce fragmentation, mitigate for increased intensities and ensure that Bay–related wildlife could move from inland sites to marsh and Bay habitats. The EIS states on page 113, "More than 200 species of birds are known to use the Presidio, as many as 50 of these for nesting. Because the Presidio is located along the Pacific Flyway, a route heavily used by spring and fall migrants, vegetated areas on the Presidio provide valuable resting places, as well as food and water sources for migrating birds." An expanded marsh area, viable wildlife corridors and protected roosting and foraging areas would reduce the impact that increased use of the Presidio might otherwise have on these species.

The Draft Plan alternative does not include the expansion of Crissy Field marsh in Area B but states that "the feasibility and scope of Crissy Field marsh expansion into Area B would be evaluated through future site planning and environmental analysis. Should this expansion not occur, this alternative could result in an adverse impact to the health of the tidal salt marsh communities." The process for determining the feasibility of the marsh expansion is not described in either the PTIP or the EIS. Additionally, both the PTIP and the EIS depict development in the possible marsh expansion area. Until a feasibility analysis for the marsh expansion is completed, or the need for buffers or expanded upland habitat adjacent to the existing marsh is thoroughly evaluated, assigning land uses to this area seems premature. The location of the possible marsh or upland habitat expansion should be identified on the Crissy Field Concept Plan with an option to build in this location if it is determined that such expansion is either infeasible or would provide limited benefits.

Thank you again for the opportunity to comment on the PTIP and the associated EIS. If you have any questions contact Lindy L. Lowe at (415)352-3645.

Sincerely,

LINDY L. LOWE
Coastal Planner

CITY OF SAUSALITO

November 20, 2001

James E. Meadows, Executive Director
Presidio Trust
Presidio of San Francisco
P.O. Box 29052
San Francisco, CA 94129-0052

Dear Mr. Meadows:

The Sausalito City Council has received a copy of a letter from the Tamalpais Valley Gateway Coalition to the Presidio Trust dated September 27,2001, which appears to be commenting on the draft EIS for the Presidio Trust Implementation Plan. We share the Coalition's desire to have a seamless and comprehensive transit system linking San Francisco with visitor destinations in Marin County and are interested in any information you can provide concerning how the proposed plan would affect visitor transit to destinations in Marin County.

Sincerely,

J.R. Roberts
Mayor

Administration: (415) 289-4167
Recreation: (415) 289-4189

FAX NUMBERS:
Community Development: (415) 339-2256

Library: (415) 331-7843
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PLANNING DEPARTMENT

City and County of San Francisco 1660 Mission Street, Suite 500 San Francisco, CA 94103-2414

(415) 558-6378 PLANNING COMMISSION FAX: 558-6409 ADMINISTRATION FAX: 558-6426 CURRENT PLANNING/ZONING FAX: 558-6409 LONG RANGE PLANNING FAX: 558-6426

October 25, 2001

John Pelka, NEPA Compliance Manager
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Dear Mr. Pelka:

The City and County of San Francisco Planning Department wishes to express support for the Presidio Trust in its efforts to develop the best possible plan for the Presidio; however, as indicated below, the City and County of San Francisco, through its various agencies and departments, has several concerns and comments with regard to the existing Draft Presidio Trust Implementation Plan (PTIP) and Draft EIS. The City and San Franciscans care deeply about the future of the Presidio, which represents 5% of the City's total land area. Development within the Presidio will have a profound effect on the San Francisco neighborhoods that border it on the south and east, and on the City as a whole. During the development and early phases of planning and implementation of the General Management Plan Amendment 1994 (GMPA 1994) there was close coordination between the National Park Service (NPS) and the City and County of San Francisco. Development proposed in the Draft PTIP requires a renewed commitment to coordination between the Presidio Trust and the City with regard to a number of issues including land use, transportation, housing, public services and utilities, and fiscal impacts.

This letter and attachments provide comments on the Draft PTIP and Draft EIS from the staff of the San Francisco Planning Department, San Francisco Public Utilities Commission, the San Francisco Department of Parking and Traffic, the Municipal Transportation Agency (MUNI), the San Francisco Department of the Environment, the San Francisco Department of Public Works, the San Francisco County Transportation Authority, and the Presidio Neighborhood Representative Work Group, a coalition of City Departments and Neighborhood Organizations created by the Board of Supervisors, Resolution No. 668-01. This letter and all attachments should be considered as comments on the Draft PTIP and EIS. Comments also reflect the input of individual members of the San Francisco Board of Supervisors, the San Francisco Controller's Office, and public testimony received at the Board of Supervisor's Neighborhood Services and Parks Committee hearings on September 26 and October 16, 2001.

GENERAL COMMENTS

A. Vision for the Future

The Draft PTIP needs to strongly assert the continued commitment of the Presidio Trust to implement the vision for the Presidio articulated in the 1994 General Management Plan for the Presidio. This vision was the product of a four-year planning process characterized by wide, deep, and exceptional public involvement.

The mandate of preserving the Presidio's unique historic, natural, and recreational resources for the future was at the heart of the original legislation to create the Golden Gate National Recreation Area, and was reiterated in the Trust legislation. But beyond that preservation mandate, the vision for the Presidio's programs and activities built upon the significance of the place to articulate a positive role for the future regarding the challenges of global cooperation and sustainability.

This original vision is at a level equal to the unique and inspiring nature of the park resource itself and the challenge of shifting the world from swords to plowshares, from war and want to peace and

plenty. The Draft PTIP vision is not of the same caliber, nor is its expression in the plan as evocative of the public input as the original GMPA vision. The original vision must not be lost in the effort to implement the Plan.

The Draft PTIP does not even restate the Vision for the Presidio contained in the 1994 GMPA before it launches into a discussion on page ii of the Summary of the high costs of operating the Presidio and the Congressional mandate for financial self-sufficiency by 2013. While it is important not to lose sight of the challenges that the costs and the mandate create, the lack of mention of the substance of the GMPA vision is disturbing.

Similarly, the Purpose and Need section of the EIS focuses on the need to bring the concepts and principles of the GMPA "into conformity with the new and additional mandates of the Trust Act," i.e. the need to be financially self-sufficient in both the short and long-term. The EIS states that the PTIP planning effort is needed in part to consider revised land use concepts to accommodate "changing opportunities and market conditions." The "concepts and principles of the GMPA" are mentioned but are never articulated in the text. This emphasis on the financial mandates of the Trust Act has had a direct effect on the Alternatives chosen for consideration in the EIS.

B. Program/Tenant Selection

Consistent with reinstating GMPA Vision, criteria for tenant selection should emphasize the importance of visitor and educational program contributions found in the proposed tenant selection criteria of GMPA. The Draft PTIP puts contributions to the visitor's national park experience on par with financial contributions (page iii), and then proceeds to state on pages viii and 65 that, "*Subject to financial considerations*, the Trust would provide many of the sites and buildings that would host Presidio interpretive programs." This limiting clause should be removed. We recommend that the National Park Service have final oversight of all activities and programming within the Presidio, and that the 1994 GMPA tenant selection criteria be retained. The lack of specific plans and open-ended program statements leave the impression that almost any land use, building size, or location site could be chosen for the various planning districts that are delineated.

Program Themes

Program themes have changed and become too generalized. The original themes identified in the GMPA were "themes of exploration and opportunity, of mobility and innovation, of heritage and the arts." The current more generalized and "value-neutral" description fails to evoke the idealism of the original GMPA vision, which spoke of "stewardship of the world's human and physical resources through global cooperation."

The Presidio GMPA vision/program addressed more than generating a lease revenue stream and a sustainable community demonstration project. The GMPA program sought to directly address the key challenge of global peace and sustainable development of the 21st century. To continue to offer exciting and relevant programming in this time of world uncertainty, the Trust should realign the programming back to the more specific, value-laden themes of the GMPA. The PTIP calls for three times as much museum space as the original General Management Plan Amendment. Museums should be limited to those needed to interpret the military, cultural and natural history of the Presidio.

Presidio Trust Role in Program Delivery

The Draft PTIP states that the Trust would play a "significant" role in the delivery of programs. The plan implies that the Trust would play the primary role in program development, coordination, and delivery. Collaboration with the National Park Service is described, but the roles of the NPS and the Trust regarding programming are unclear. Presumably public interpretive services, visitor orientation, and educational programs on all lands within the Presidio would be primarily managed by

the NPS in accordance with the Presidio Trust Act, but this is not clearly stated. Given the sensitivity of the issues of cultural diversity and increasing access faced by an urban national park, community input into the programming decisions seems highly desirable.

Emphasis on Financial Support over Program Provision

The Draft PTIP represents a substantial shift in the relative emphasis on financial versus program support as part of the Tenant Selection process. This approach is substantially different from the GMPA, which assumed that the tenants would be the main providers of park programs as well as the source of financial support through lease revenues. By contrast, the Draft PTIP assumes that tenants whose primary contribution is substantial lease payments or other revenue generation become more prevalent, and that program provision by such tenants might be very limited.

Threat to Program Diversity

While the advantages of program consistency and coordination make sense, the idea of making the Presidio's resources available primarily "to the highest bidder" could well jeopardize the unique mix of non-profit and other uses that are so successful and vital in the Presidio and at Fort Mason. If such an emphasis on the bottom line is to become increasingly prevalent, the tenant selection and programming needs to compensate by very consciously targetin g the economic and social diversity that such a revenue driven system is likely to reduce. Criteria such as amount of outdoor and indoor space provided for public access, types of programs promoted, hiring and workforce diversity may become increasingly important to counteract other forces.

The discussion of funding and delivery of programs on page 73 states "program quality and quantity would depend on the Trust's ability to generate lease revenue, as well as the extent of philanthropic support received for Trust and National Park Service programs." The clearest statement of tenant responsibilities for programs is on page 75, where "Tenants would be asked to provide support for park interpretation and cultural programs in a variety of ways - by directly providing a program to park visitors, by contributing financially, or by offering in-kind services to a park program." However, a detailed program -- including the concomitant total cost and method of allocating a fair-share portion to tenants for which tenants would be responsible to provide in-kind or through an in-lieu fee payment -- is not presented. Developing such a program plan would seem to be a first step to developing lease terms as such contributions would be a primary condition of leases under the Draft PTIP if the program commitments of the GMPA are to be honored. Such an additional cost should also be included in the financial feasibility assessment of the proposed plan and the alternatives.

C. Principles

The fundamental principles in the Draft PTIP should continue to be those of the GMPA 1994.

Natural Resources

The PTIP should commit to no new construction that might interfere with the habitat restoration projects and expansion of wetlands, or with the Tennessee Hollow riparian corridor and its connection to the expanded wetland. The Trust should require that the Doyle Drive alignment and off ramps allow for a Crissy Fields Marsh of at least 30 acres with minimum impact on the riparian habitat along with continued support for Tennessee Hollow drainage to the Marsh. Unless restored to optimum size, the lagoon cannot evolve into a self-sustaining tidal marsh. The scope of work for the proposed study should be made available for public and peer review. General Plan policies recommend integrating the landscaping, design, development, and use of the portion of Crissy Field under jurisdiction of the Trust with the portion managed by the National Park Service.

The PTIP calls for restoration of riparian habitat, but restoration is not sufficiently defined. Specific measures are needed. These should include adequate setbacks from the banks of each tributary, and a

commitment made to the removal of the landfill, Morton Street ball field, and buildings to accommodate the riparian corridor restoration.

The Vegetation Management Plan shows significant sensitive natural habitat in the area of the Public Service hospital. The Trust should commit to preserving habitat rather than converting to conventional "landscaping." Care should be taken not to apply recycled water to sensitive areas where it could alter the natural groundwater chemistry, flow characteristics, or the nutrient content of native soils.

Cultural Resources

The mitigation of potential cultural resource impacts analyzed in the Draft EIS will largely rest on the Programmatic Agreement, since it is a finalized PA that will satisfy the Trust's responsibilities under Section 106 and 110(f) of the National Historic Preservation Act. Section VII. (Identification of Historic Properties) of the draft Programmatic Agreement (PA) seems to make a distinction in the process of evaluation of significance and of eligibility for listing on the NR between "properties" and "archaeological properties." It is recommended that Section VII of the PA be amended to apply the same evaluation process to both non-archaeological and archaeological properties. More specifically, the PA should provide that if the Trust determines that an archaeological property is eligible for listing on the NR, the Trust shall treat the archaeological property as eligible for Section 106 purposes. If the Trust determines that an archaeological property is ineligible for the NR, and the Trust and the NPS agree that the archaeological property is ineligible, it is ineligible. If the Trust and the NPS disagree about a property the Trust has determined ineligible, the Trust should request an opinion from the SHPO.

Transportation

The Draft PTIP is primarily a policy and land-use plan. It should be an integrated land use and transit plan. The proposed transit center and replacement for Doyle Drive should be closely integrated with the plan's proposals. It is particularly important in the Letterman area, and throughout the Presidio to have a very strong Transportation Demand Management (TDM) program to help reduce the impacts of traffic on the adjacent off-site neighborhoods. The variety of TDM efforts identified in the Appendix of the Draft PTIP is impressive, but such a program needs to be continually monitored and readjusted to be effective.

The TDM Plan and Parking Management Program lacks incentives to shift people from single occupancy vehicles (SOV) to transit. The Presidio Trust as landlord has the ability to ensure tenant compliance with the goals of both the TDM and Parking Management Program. The programs lack incentives to ensure their success. How will the programs be managed to quantify their success and make adjustments if goals are not reached? What will be financial contribution of the Presidio Trust to enhance MUNI service and other improvements assumed by the Draft PTIP, which are outside the Presidio boundaries?

The approach needs to be multi-modal, and to establish performance standards to evaluate its effectiveness over time, particularly as major employers come on-line. This area requires continual coordination with the City and County of San Francisco, including transportation planners from the Planning Department as well as MUNI and the Department of Parking and Traffic. Currently, transportation facilities are at or exceeding capacity. The only way to increase capacity is to use higher capacity modes of transport. It is important that the Presidio's transportation program be integrally linked to the City's and region's efforts to develop an effective, regional, multi-modal transportation system.

Parking Management. Parking fees are discussed in the Draft PTIP as a revenue source, but the costs of managing parking and the issues of setting parking fees or regulations to avoid spillover impacts

on the neighborhoods are not fully acknowledged. This is an essential area for City/Trust coordination, particularly with the Department of Parking and Traffic, as any change in one area is likely to have impacts in another. The Presidio's Parking Management Plan should represent a three way coordination between the Trust, NPS and the City, and the aim should above all be to reinforce the effectiveness of the TDM effort in reducing the volume of automobile traffic generated by the Presidio, not generation of revenue from parking fees or fines.

Doyle Drive. The provision of a direct highway connection to the Presidio in the Letterman area is one of the fundamental concepts behind the Doyle Drive planning to date. This direct access is essential to avoid the negative impacts of the current access patterns, which force visitors approaching from the north onto a complex route through neighborhood streets for access to the Presidio. In addition, concepts for lowering the roadway and decreasing its noise and visual impacts on the Presidio and adjacent neighborhoods should be strongly supported. Here again is an essential area for Trust, National Park Service and City and County coordination as this project moves ahead under Caltrans' direction.

TIP CONSISTENCY WITH GENERAL PLAN POLICY - RELATIONSHIP TO THE GMPA

A. Consistency with City Policy

The 1994 General Management Plan Amendment was prepared with extensive involvement by the City and County, including the participation in the planning process of a Presidio Planning Coordinator from the San Francisco Planning Department, funded by the National Park Service. The close coordination enabled by this arrangement helped to minimize policy differences and encourage cooperation on numerous operational issues affecting the transition from army base to national park.

This close coordination with the Planning Department in the GMPA process gives the 1994 plan a status that approaches that of an area or specific plan, which further describes the General Plan policies for an area and then guides development and use of that area. The PTIP process did not benefit from this kind of close coordination and exhaustive public involvement, and has not received the same kind of broad community support.

In addition, the NPS established a MOU with the City that provided the City with an avenue to interact with the park as an equal party. As the Presidio will be, in effect, "a city within a city," San Francisco should have a formally recognized relationship with The Trust and its future development that extends beyond the limited scope of this public comment period and forms the basis of a future relationship.

Open Space Preservation and Limit to New Development

Among the policies in the Draft PTIP that are consistent with the General Plan are those supporting the preservation of open space. Policy 5 in the Open Space Element calls for preservation of the open space and natural historic scenic and recreational features of the Presidio. Except for expansion of facilities at Letterman General Hospital and Western Medical Institute of Research, new construction should be limited to replacement of existing structures with an improvement of similar size.

Public Use and Access

The San Francisco General Plan designates the Presidio as "P" for Public Use. This designation limits the possible uses of the Presidio were it ever to be sold by the Federal government for private use. It allows a wide variety of public and institutional types of uses, including open space. The designation also expresses the idea that the Presidio is a public treasure that should be available to the public at large. The 1994 GMPA expresses this feeling of a public role that is regional, national and even international in scope. The conversion from an ungated military base to national park expressed

this public nature very appropriately. It is important that the Draft PTIP continue this process by accepting only those tenants who serve a public purpose and are fully committed to the widest possible access to the park's resources, rather than to private companies or elite resorts which serve to limit such access.

Preservation of Housing

There are numerous General Plan policies that support preservation of the existing housing supply, and the City supports the concept of no net loss of housing. However, guidelines for new development and land use changes in the Presidio, which are contained in the Recreation and Open Space Element of the General Plan, Citywide System Policy 5, state that "No additional housing units should be constructed in the Presidio." Given the status of the Presidio as a national park, the focus of the Trust's efforts should be on subdivision and reconfiguration of existing housing. Only when it is not possible to convert existing structures into new smaller units should new housing be constructed.

The Draft PTIP states on page 42 that there are 1,650 housing units in the current housing mix throughout the Presidio. Of this number, 1,116 are houses and apartments. It is not clear why 538 group quarters, such as barracks and hospital beds would translate into individual housing units. An accurate accounting of existing housing units is necessary to achieve the goals of no net loss of housing and no additional housing at the Presidio.

Jobs-Housing

The Draft PTIP has a very aggressive jobs-housing balance goal – 51.7%. It is not clear how this will be achieved with the planned demolition of existing housing, and construction with replacement housing. What will be the ramifications vis-à-vis affordability and Trust expenses and income? This analysis should be presented in the EIS.

B. Points of Concern and Inconsistency

Affordability of Housing

The affordability of the housing, particularly to those working at the Presidio, is another major City concern expressed in numerous General Plan policies. The affordable housing issue is discussed only briefly in the Draft EIS and not at all in the in the Draft PTIP. While housing can provide substantial revenue to the Presidio, the original GMPA concept of offering first access to employees working or participating in programs at the Presidio should still be emphasized, both to provide the increased sense of a sustainable community and to reduce commute traffic impacts. The original GMPA and EIS called for a Housing Management Plan to address these issues. A Housing Management Plan should be included in the PTIP, and should be the focus of ongoing coordination with the City's Planning Department and the Mayor's Office of Housing.

Dispersed Development Pattern

One relatively minor point of General Plan inconsistency would be the very low-density, spread out land use pattern. This pattern is largely a function of the historical development of the Presidio and the fact that it was unaffected by the fierce competition for land that led to the compact development pattern in the rest of the City. Since the Presidio is a National Historic Landmark District containing layer upon layer of historically significant buildings and structures, opportunities for altering this development pattern are few, and all changes should adhere strictly to Landmark Historic District guidelines. The focus should be on reconfiguration of existing buildings rather than infill development.

The Draft PTIP proposal to cluster housing of higher density in the northeast area, where it is closer to public transit, and supported with nearby mixed uses to meet daily needs is compatible with the

General Plan. Nevertheless, concentration of development must not occur at the expense of significant environmental impacts on already overburdened San Francisco neighborhoods. In this case, the Marina and Cow Hollow Districts would experience increased congestion on local roadways, deterioration in intersection level of service, and increased air emissions and traffic-related noise. The Trust should not embark upon a plan to concentrate development in the northeastern portion of the Presidio until mitigation is in place to eliminate potentially significant environmental effects caused by this concentration. Coordination with the Planning Department is suggested to assure that proposals are compatible with surrounding City patterns and services, and employ transit-oriented development principles.

Major Employment Areas Near Transit

The General Plan calls for concentrating major employment areas in the downtown and other areas where there is transit to help accommodate them. Letterman was historically a major employer, and the proposed Digital Arts campus will continue this role.

A key mitigation for potential impacts from such a campus is fast and efficient (express) transit service to key city, downtown, and regional transit connection destinations that outperform the automobile. This suggests express service to Downtown in general and to regional transit connections (new Transbay Regional Transit Center, the Ferry Building and BART), and to Golden Gate regional transit serving the North Bay in particular.

Traffic Along Recreational Shoreline Areas

The General Plan contains policies that discourage through traffic along recreational shoreline areas because it cuts off access to recreation, and endangers pedestrians and bicyclists. Policy 18.5 of the Transportation Element states "Mitigate and reduce the impacts of automobile traffic in and around parks and along shoreline recreational areas." The PTIP does not discuss specific steps that would prevent Presidio and cut through traffic from using Marina Boulevard, which borders Marina Green shoreline open space.

Draft Environmental Impact Statement

A. General Remarks

The EIS does not analyze consistency with local plans and policies, particularly the policies contained in the San Francisco General Plan. The document should address inconsistencies between the proposed alternatives and "the objectives of ...local...land use plans, policies, and controls" in the City and County of San Francisco. 40 C.F.R. §1502.16(c). This is especially critical given the Presidio's physical relationship to the City. Where an inconsistency exists, the EIS should describe the extent to which the Presidio Trust would reconcile its proposed actions with the City's plans and laws.

The EIS contains unexplained inaccuracies (inconsistencies, and data errors), which are described in more detail in the individual City department letters. One example is that the 1994 GMPA Transportation Planning and Analysis Technical Report shows the Doyle Drive/Marina Boulevard/Lyon Street/Mason Street intersection as a single intersection operating at LOS E during PM peak hour, while the Draft EIS evaluates the same intersection as two intersections, both operating at LOS B.

All the alternatives in the Draft EIS rely on Attachment A to Appendix J, a chart containing square footage subtotals for different categories of use in different areas of the Presidio. Attachment A is completely conclusory. The Draft EIS failed to include any background documentation on the development of Attachment A, and fails to indicate which buildings were used to make up the

different category subtotals. Without detailed information to support the square footage calculations, no verification is possible, and the Draft EIS conclusions on square footage cannot be cross-referenced to particular buildings; a necessary task when determining the extent to which existing buildings will be demolished, expanded or renovated and in drawing conclusions about the overall square footage of each alternative.

Environmental Consequences

The document does not adequately address the impacts of proposed development on surrounding City neighborhoods and business/commercial districts, City agencies and the City as a whole. The analysis is vague and inadequate in terms of cumulative impacts. The Presidio is in a position as a landlord to control not only the development that would occur on the Presidio, but also the impacts of this development. Tenant agreements could help to ensure transit over vehicle use, not only within the park, but also as a means of getting to and from it.

The document suffers generally from the absence of specificity in its analysis of impacts, in contrast to the General Management Plan Amendment EIS. The strongly-conceptual approach used in the Draft EIS may be to the disadvantage of the ability of decision makers to make sufficiently-informed decisions and of the public to provide timely input into those decisions.

Cumulative Impacts

The cumulative impacts are incomplete. The contribution of Presidio development from all areas is missing, and therefore the full impacts of project build-out are impossible to assess. Existing conditions, impacts attributable to Presidio development, and total future conditions should be displayed together to clarify full cumulative impacts as well as the project's contribution to cumulative impacts.

The preparation of a programmatic EIS is appropriate for this stage of development. A programmatic EIS may be prepared when proposed actions have common geographic locations, common project elements such as cumulative impacts, or have common stages of development. Therefore this programmatic EIS should acknowledge build out of Area A, the Letterman Complex and all other subareas of the Presidio as part of the total picture, and include these impacts within the cumulative impacts analysis.

Mitigation Measures

According to NEPA, a mitigation measure, to be effective must: 1) avoid; 2) minimize; 3) rectify; 4) reduce over time; or 5) compensate. The Draft EIS should consider the economic, environmental, logistical, technological, legal, and social feasibility of each mitigation measure. Further, the Draft EIS should identify the secondary environmental effects that might occur from implementation of the mitigation measures.

For the most part, mitigation measures included in the EIS are vague, rely on compliance with existing regulations, monitoring at some future time or development of specific mitigation programs at a future date, and are frequently outside the jurisdiction of the Presidio Trust. Many of the mitigation measures associated with traffic impacts would cause secondary impacts on parking, and on traffic at other intersections, which are not addressed. The levels of service with mitigation should be clearly shown to assess the effectiveness of recommended traffic mitigation. Some mitigation measures do not take into account the prohibition of trucks or buses on certain city streets. Tour buses and truck traffic will be subject to the City's laws and ordinances.

B. Supplemental and Programmatic EIS

The Trust has chosen to prepare a Supplemental EIS on Area B alone. The GMPA 2000, Draft Plan, and other alternatives are new proposals for the Presidio. They do not "flow down" from, and have

little in common with the 1994 GMPA EIS, which analyzed potential comprehensive development of Area A and B. The Trust's decision to segregate the environmental documentation of Letterman Center has the appearance of piecemeal development within Area B. A programmatic EIS is appropriate for projects that have common geographic boundaries, common project elements, or common stages of development. It is difficult to analyze the effects of development of Area B without consideration of the Letterman Center, which lies within Area B, and without looking at Area A, since development in all parts of the Presidio is inescapably connected. "Proposals, or parts of proposals which are related to each other closely enough to be, in effect, a single course of action [should] be evaluated in a single impact statement." 40 C.F.R. §1502.4(a).

C. Alternatives

NEPA requires that the alternative of taking no federal action must be considered. When the proposed action is the update of an adopted management plan or program, the no-action alternative is the continuation of the current management plan or program. See Forty Most Asked Questions Concerning CEQ's NEPA Regulations, Question Three. The no-action alternative generally does not satisfy the proposed action's purpose and need, but its inclusion is required by NEPA as a basis of comparison. It can be used as a benchmark for comparison to compare the magnitude of the environmental effects of the various alternatives. The GMPA 2000 alternative is not the no-action alternative. The GMPA 1994 is the current adopted plan for the Presidio, and offers a meaningful comparison with the other alternatives. Therefore the 1994 GMPA should be described and analyzed as the No-Action Alternative. The 1994 GMPA EIS analyzed the potential impacts of both Areas A and B. In order for a meaningful comparison between the impacts of the 1994 GMPA and the alternatives in the PTIP EIS, information should be presented in the EIS on both Areas A and B.

The full range of options for implementing the GMPA vision is not assessed under the Alternatives. The Conceptual Alternatives formulated in November 2000 take integral components of the GMPA, separate them, and then set them up as separate organizing principles for each individual alternative. The Plan and EIS should have formulated, analyzed, and tested options for implementing the full range of the GMPA vision within the Presidio Trust constraints of financial self-sufficiency.

All of the alternatives analyzed assume direct access from Doyle Drive, yet this project is not funded and there is no guarantee that it will be constructed. Some alternatives should be analyzed that do not assume funding and build out of Doyle Drive.

The primary organizing principle for the Alternatives, as acknowledged on page 22 of the concept workbook, is the financial strategy. Financial and management strategies examined should have been based more broadly on a range of creative but realistic funding concepts and sources than simply on exclusive reliance on funding from the market valuation of Presidio's existing real estate assets. While the comparison of the financial feasibility of different management approaches is one of the important objectives of the Alternatives analysis, it is important that other key objectives of the GMPA such as protecting resources, providing quality programs, and allowing public enjoyment of park resources are equally considered in discussing trade-offs and choices. These other key objectives need to be embraced more fully by the Trust in the Purpose and Need statement, and reflected as such in the selection and evaluation of Alternatives considered within the EIS. This latter point presumes that alternatives are formulated to adequately implement the central mission and vision of the GMPA, but even so, the degree to which the complete vision and mission is accomplished by an alternative should also be one of the evaluation criteria.

Applying these criteria to the present set of alternatives, only the GMPA 2000 alternative would register positively, but given the limited development of the implementation aspects of this

alternative, it is difficult to determine. All the other alternatives would register negative values, including the PTIP. A particular concern with an almost exclusive focus on a financial comparison of alternatives is that management strategies such as the timing of demolition for revenue-generating facilities such as the Wherry housing have been somewhat arbitrarily varied among alternatives.

Presidio Neighborhood Representative Work Group Alternative

The Presidio Neighborhood Representative Work Group voted to recommend that a new seventh alternative, the No New Construction Alternative be considered in the Draft EIS. In this alternative there would be no new construction in the Presidio, and no expansion of existing structures, either vertically, horizontally or underground. The Work Group feels that this alternative can achieve the goals set by Trust, and meet the purpose and need of the project as stated in the EIS.

Similarity of Alternatives

NEPA does not requires that a Draft EIS evaluate a reasonable range of alternatives. The alternatives evaluated in this EIS have similar impacts, and differ little from the No-Action Alternative. A new alternative(s) need to be evaluated, which reduces or eliminates the impacts of the six alternatives analyzed in the EIS.

Alternatives Screening

The EIS contains a qualitative discussion of alternatives considered and not evaluated in the EIS in Chapter 5, Consultation and Coordination. It is not clear from this discussion whether the lead agency had developed a list of feasibility factors based on cost, logistics, social, environmental or legal factors with which to screen and eliminate alternatives. What screening process was used to exclude alternatives from the "reasonable range."?

Environmentally Preferable Alternative

The environmentally preferable alternative must be identified in the Final EIS. See 40 C.F.R. §1505.2(b), and Forty Most Asked Questions Concerning CEQ's NEPA Regulations, Question Six. Because this alternative, in general, causes the least damage to the environmentand best protects natural and cultural resources, the Presidio Neighborhood Representative Work Group recommends that the Preferred Alternative incorporate the following characteristics:

1. No more than 5.1 million sf of building space allowed in the 1994 GMPA, for Areas A and B combined;
2. No new construction
3. Phased demolition called for in the 1994 GMPA;
4. Provide housing units by reconfiguring or subdividing existing buildings. Provide no more housing units than currently exist and maintain proportion between housing units and SROs. Hospital beds should not be counted as housing units;
5. Limit cultural and educational building space to the amount proposed in the 1994 GMPA; and
6. Limit retail tenants to those uses that would support park programs and services as envisioned in the 1994 GMPA.

D. Financial Assumptions

Timing of Wherry Housing Demolition

The timing of the Wherry Housing demolition is consistent across all the alternatives analyzed, except the GMPA 2000 alternative. The GMPA 2000 financial model assumes Wherry housing is demolished by the year 2013, in contrast to the other alternatives in which it would be retained for the full 20-year period. We would encourage the Presidio Trust to reconsider the earlier demolition schedule that is assumed in the GMPA 2000 financial model for two reasons. First, as stated in the Draft EIS, changes since 1994, like the mandate to be self-sufficient, make it difficult to rely upon the

GMPA alternative exactly as it was described in the Final GMPA. This seems to be particularly relevant to the timing of the Wherry housing demolition because according to the Financial Analysis Technical Memorandum, Wherry housing is a significant revenue source for the Presidio. Those revenues are so significant that leaving Wherry housing in service for leasing as long as possible has a positive effect on the financial performance of the planning alternatives. Given the mandate to be self-sufficient it would seem reasonable to assume the same demolition schedule for the GMPA 2000, the Draft Plan, and Alternatives A through D.

The Assumptions and General Limiting Conditions in Appendix J state that the Presidio Trust has not determined the timing of rehabilitation, demolition, and new construction. By assuming an earlier and less phased approach under the GMPA 2000 Alternative, the comparison of the alternatives initially stated (during scoping) that this alternative did not achieve financial viability. The Draft Plan Alternative is given an artificial boost over the GMPA alternative in assuming phased demolition of the housing beginning in 2013, rather than total demolition by 2013 for the GMPA 2000 Alternative.

Operating Expenses

Operating expenses are derived from the Presidio Trust's adopted FY 2001 budget and are applied to all alternatives, despite differences in total building square footage, residents, employees, and visitors for each alternative. In addition, the financial models assume that the operating expenses for facilities, legal, planning, real estate, and operations decline while expenses for special events, public safety, finance, insurance, and programs are assumed to be constant over the 20-year period.

We question the practice of applying Year 2001 budget figures for each alternative regardless of square footage, residents, employees, and visitors. We would like to particularly note our concern about using Year 2001 budget figures to represent public safety costs over the 20 year period of the financial model. Accordingly, we encourage the Trust to consider incorporating the costs identified by U.S. Park Police (USPP) that would be required to maintain current service levels.

Specifically for the GMPA 2000 alternative the USPP identifies start up costs for hiring additional personnel, purchasing new vehicles and other equipment to total up to $752,000. In addition the annual costs for staffing, recruitment, equipment, and supplies are estimated to be as much as $2.6 million. We believe that such an analysis for the other five alternatives would be instructive to the financial model. In addition the Trust may want to encourage the Fire Department to identify costs to incorporate into the financial model given that changes in population are important life safety factors and operations undoubtedly will have to be adjusted to maintain current service levels.

Mitigation Costs

It is not clear if the financial models include the costs associated with the mitigation measures identified in the GMPA EIS and the new mitigation measures outlined in the Draft EIS. We encourage the Presidio Trust to address these costs in the Final EIS. These costs will be different with each alternative, depending on the level of development and the extent of impacts. We would like to see a financial plan that reflects these differential costs, and shows whether or not each alternative can generate a revenue stream sufficient to offset the cost of implementing mitigation strategies, such as increased transit service. Does each of the alternatives generate sufficient revenue to offset both the costs of operation and the cost of each alternative's specific mitigation requirements?

Costs to the City and County of San Francisco

The EIS analysis must be based on the specific location of the proposed action and take into account the entire affected region and socio-economic situation surrounding the proposed action. Economic and social effects must be discussed when they are interrelated with natural or physical effects. See 40 C.F.R. §1508.14. The EIS should contain analyses of the effects of the proposed project on the

City and County of San Francisco. The proposed project would economically affect the City in two ways: cost of mitigation, and lost tax revenue.

The costs of mitigation are mainly associated with transportation impacts. These costs include, but are not limited to, the purchase of new buses, installation of street improvements such as traffic lights and land reconfigurations, and ongoing maintenance costs associated with street repaving and repair. The cost of lost tax revenue is associated with businesses that might otherwise have located within the City, but choose instead to locate on Federal land. Some of these businesses will compete directly with established businesses outside the Presidio gates, but are not subject to the same local and state taxes. For example, lodging, restaurants, and retail businesses will compete with nearby businesses on Lombard Street and the surrounding area. Is the Presidio expecting to create a tax-free business zone?

E. Transportation and Circulation

Cumulative Build-out

The environmental consequences section is lacking in detail, contains misinformation, and does not address the contribution of proposed development at the Presidio to cumulative impacts. The Draft EIS lacks maps that show intersection figures with future volumes. Both new figures and existing tables should show the project contribution to future volumes, total cumulative volume growth, and the percent of project contribution to cumulative volume and growth. Cumulative impacts should include full build-out of land use projects being considered in the traffic models. It is not clear from the analysis what the weekend travel impacts will be, based on combined trips to Area A and Area B.

Maps and Figures

There are no land use/traffic circulation maps for the alternatives included in the Draft, the EIS, or the background traffic reports. These maps are needed for evaluating the adequacy of the circulation system for all transportation modes including transit, and the trip distribution percentages for each alternative. Figures 3-13 are nearly identical, and should be clarified to highlight the differences between alternatives. A map and chart should be provided indicating the distribution of the Presidio trips, showing directional distribution. Are both weekday and weekend trip distributions available? Figure 27 displays roadways that no longer exist, such as Berry Street between 2nd and 3rd Streets at Pacific Bell Park, and the Oak Street on-ramp on the Central Freeway. Golden Gate Transit bus routes should be shown on Figure 31. MUNI and GGT bus stops should be shown. Interstate 680 is mislabeled on Figure 1.

Transit

The Transportation and Circulation evaluation of impacts should be expanded to include a table and discussion of existing and future transit capacities and Maximum Load Points (MLP), and the transit demand projected for each alternative. What measures are recommended for future MUNI ridership to be accommodated? By what means will this be accomplished? The Presidio shuttle bus operations should be mapped showing key transfer points. What are the existing and planned transfer points for shuttle to MUNI or GGT connections? Does the proposed system comply with existing City restrictions on neighborhood streets outside the Presidio boundary?

The Draft PTIP shows a transit hub on page 48 and discusses it on page 49; however there is no mention of a transit hub in the EIS. Please clarify any proposed plans for a transit hub in the Presidio and the commitment of the Trust to creating such a hub to alleviate future traffic impacts.
The Trust has indicated that it would provide shuttle service from recreation areas to San Francisco attractions. What will be the extent of this service in terms of frequency, headways, and projected ridership? How will the service be coordinated with MUNI? What will be the impacts of this service on adjacent neighborhoods?

What is the baseline used to estimate ridership volumes on page 322 and in Appendix F. The assumption used in establishing the baseline is not explicitly stated. Are these ridership volumes over and above year 200 actuals for Area B, or do they include some unstated levels of current ridership? Transit service development should be tightly integrated with the PTIP alternatives. What are the potential increases in transit service and what are the future improvements that will alleviate these impacts? What mitigation is recommended to alleviate intersection congestion impacts on transit? What will be the Trust contribution to ensure that the impacts proposed are mitigated? What is the capacity for existing and future conditions at the MLP, and what will be the project contribution to MLP exceedance. When are the projected impacts on transit expected to occur – 2013 or 2020? The table attached to MUNI's comment letter shows associated capital costs associated with the proposed alternatives, not including any facility needs, could reach approximately $8.75 million, with annual operating costs of $5.6 million.

Doyle Drive

Caltrans and the San Francisco County Transportation Authority (SFCTA) are examining various alternatives for Doyle Drive, yet Doyle Drive alignments are completely lacking from the land use alternatives analysis. The EIS should contain a figure showing Doyle Drive. Girard Road, which is proposed as the location of a Doyle Drive/Presidio interchange should also be shown in a figure. The EIS should describe how the phased construction of Doyle Drive would be coordinated with project phasing at the Presidio. Would the parking currently located under Doyle Drive be relocated? What effect would Doyle Drive have on the internal circulation network? How would the Doyle Drive alternatives affect development patterns at the Presidio? What would be the connections to Doyle Drive from the major employment centers being proposed? What would be the development scenario if Doyle Drive is not funded or built?

Tour and Charter Buses

The impacts of additional tour and charter bus traffic are not discussed in the EIS. Existing tour bus restrictions on City streets are not discussed in the transportation section. The existing Gray Line/Coach USA Trolley Hop Route and existing ridership should be described. How many additional tour and charter buses will be attracted to the Presidio under each alternative? How much of this future tour and charter bus traffic will be combined trips to Area A and B? Are there trips associated with the development of the Letterman Complex?

It is vital that the full cumulative impacts on traffic of tour and charter buses, vehicles, shuttles, and construction vehicles at build out of Area A, Area B, Letterman, and other foreseeable future projects in the area be considered. What are the potential impacts to pedestrians, bicyclists, and joggers of cumulative build out in the Presidio and surrounding area. What mitigation measures are proposed for these impacts?

What is the status of the tour bus/charter bus management plan referred to in the Draft PTIP? What are the elements included in this plan that would keep tour buses off neighborhood streets and control their numbers, timing, and access? This plan will have to conform to existing restrictions on City streets. Because of the unhealthy and potentially dangerous effects of tour and charter buses on residential streets within the City of San Francisco, the tour bus/charter bus management plan must ensure that access to and from the Presidio is via Doyle Drive (Highway 101), Park Presidio (Highway 1), Geary Boulevard, and Lombard Street.

Assumptions

The traffic analysis includes the assumption of Transportation Demand Management (TDM) program goals for all alternatives except the Minimum Management Alternative. This assumption means that the amount of traffic shown on the roads analyzed is reduced for five alternatives and that traffic has shifted to other travel modes, such as transit. Until the effectiveness of the TDM program has been

demonstrated, using this assumption for a traffic analysis leads to unsubstantiated and potentially unrealistic results. The trip reducing impacts of the TDM program should be quantified and documented. Potential transportation impacts should be analyzed without the assumption of an effective TDM program. Why was the TDM program assumed to be the same for all alternatives. Different land uses would require different trip reduction measures.

Why aren't City person-trip generation rates used in the analysis? What is the basis for the rates that are used? What is the basis for the short-term parking turn over rates? Are the rates based on San Francisco survey data and why were the City's turnover rates not used?

Has the Presidio conducted mode-split surveys of existing employees to determine percentages that drive alone, carpool, use transit, walk, or bicycle? The mode split presented on page 321 of the EIS should be clarified. Is this a daily trip mode split or a mode split for a specific purpose? What is the source of these splits? How many people currently live and work at the Presidio? How many will live and work there under each alternative?

What is the basis for assuming external, internal, and linked trip percentages? The industry standard for linked trip reduction is 10% for mixed-use developments. What mix of variables influenced the reduction factors used, which range from 11% to 16% for each alternative.

The Trust's live/work model assumes that most employed residents of the Presidio would also work within the Presidio. It is not likely for workers in a multiple worker household to work at the same location. Some work trips would have to leave the Presidio. There is also no discussion of trips outside the Presidio to childcare facilities or schools. What proportion of household work trips was assumed to be internal to the Presidio?

Intersection Impacts

The proposed developments' impact on local intersections is not fully described. For instance, in describing project contribution to the Park Presidio Blvd./Lake St. and Park Presidio Blvd./California St. intersections, only project contribution to total volume is analyzed. What is the project's traffic contribution relative to the intersections' cumulative volume growth (project contribution/ (2020 volume – 2000 volume))? What is the project contribution to intersection critical movements? With regard to regional growth at these intersections, what is the 11% increase in PM peak hour volume based on, and how are the Doyle Drive assumptions factored into the analysis.

Table 45 compares existing and projected traffic volumes, but does not indicate the amount of new traffic generated from the proposed project and the percentage of traffic growth that is attributable to proposed Presidio development, growth in through traffic, and growth from development outside Area B. Is traffic from Letterman Digital Arts included in the cumulative figures? What percentage of the growth is attributable to the proposed project? The tables shown on pages 323, and 328-330 should include existing LOS so that the reader does not have to constantly check back to earlier figures.

The transportation section shows data that is inconsistent with the 1994 GMPA EIS. The 1994 EIS treated the intersection of Mason/Marina/Lyon/Doyle as a single intersection with existing LOS C in the AM peak period, and LOS E in the PM peak period. The PTIP EIS lists Doyle/Marina/Lyon and Mason/Marina Lyon as two intersections, both with LOS A in the AM peak period and LOS B in the PM peak period. The report should discuss the appropriateness of analyzing this as two separate intersections. Because of the short storage area, back-ups in traffic on southbound Lyon Street waiting to turn left onto eastbound Marina Boulevard could impact the performance of the Lyon/Mason/Marina portion of this intersection. The report should document any changes in traffic volumes at this intersection since studies were performed for the 1994 GMPA.

Richardson/Lombard is shown in the 1994 GMPA EIS as having LOS E in the AM peak period and LOS B in the PM peak period. The PTIP EIS shows this intersection with LOS A in both the AM and PM peak period. Other intersections show that LOS has deteriorated in the intervening seven years between the publication of the two documents. What is the explanation for the improvement in LOS at these two intersections? This discrepancy also means that no mitigation is recommended for these intersections, where it may be needed under future conditions.

The future conditions analysis should include Girard Road, which would provide direct access to Doyle Drive. At a minimum, the intersections along Girard should be analyzed for both no-direct and direct access.

The analysis of traffic impacts is limited to weekday AM and PM peak hour conditions, but weekend conditions are not evaluated. A weekend condition analysis should be included in the intersection capacity analyses, because of the increased activity of recreational trips on weekends. The Background Transportation Report shows that most alternatives have weekend person trips 50 to 90 percent higher than weekday person trips. Fort Mason alone received 1.6 million visitors in the year 2000. Given the potential cumulative weekend trips generated by Area A and Area B, a more rigorous analysis of weekend conditions should be performed.

The impacts of increased vehicular traffic on the ability of pedestrians and bicyclists to cross busy streets is not discussed. With the increase in vehicular traffic, what bicycle and pedestrian facility improvements would be made to enhance safety?

The parking demand figures only include non-housing parking demand. The EIS should show total parking demand and supply with housing included. What are the parking plans for Letterman Complex, and has this demand been included in cumulative estimates? Will the transportation demand management program include the Letterman Complex?

Mitigation Measures

Almost all of the mitigation measures recommended in the Draft EIS are beyond the jurisdiction of the Presidio Trust. How does the Trust intend to deal with this? By what means will the Trust ensure implementation of needed mitigation? The Draft EIS does not include a phased mitigation plan. The EIS should describe how mitigation for transit impacts will be coordinated with development phasing, development of the Lucas Digital Arts Center and in concert with development of Doyle Drive. The last sentence of the fourth paragraph on page 319 states that "The existing roadway between Gorgas Avenue and Lyon Street would be reconstructed as a one-way roadway." Is this roadway under the jurisdiction of the Presidio?

The TDM Program mitigation measure is both a mitigation measure and assumed to be part of the project description and assumed in the traffic analysis. Since the program consists mainly of strategies and lacks concrete detail for implementation, the Draft EIS should analyze potential impacts with and without such mitigation. How will enforcement of these measures be monitored?

With regard to Special Event Parking Management, how will these events be coordinated with City involvement? How will the City be notified?

The impacts of proposed mitigation measures are not addressed in the Draft EIS. Many recommended mitigation measures solve one problem, but either neglect or exacerbate other problems. Mitigations TR-1, Presidio Avenue/Pacific Avenue intersection, and TR-2, Arguello Boulevard/Jackson Street intersection, resolve congestion at one intersection, but do nothing for other nearby intersections at Presidio Avenue/Jackson Street, Presidio Avenue/Washington Street, and Arguello Boulevard/Washington Street, respectively, which experience the same impacts. Mitigation

TR-3 to remove parking on the east side of 25th Avenue to provide a right turn lane does not address the consequences of removing much needed parking space from City street or the interference with existing bicycle lane operations at that location. How could this mitigation be modified to avoid impeding the bicycle facility? How many parking spaces would be removed? Does the Trust have a compensatory measure for the loss of on-street parking? Mitigations TR-11, TR-12, TR-15, TR-17 also present problems, that are outlined in detail in the attached letter from the Department of Parking and Traffic.

There are many feasible mitigation measures that have not been considered in the EIS. These include participation in the City's CarShare program, employer participation in the Commuter Check program, free transit passes for employees, and maximizing the number of Presidio employees who live at the Presidio. Will priority be given to Presidio workers for housing? Will the Presidio Trust control the parking lots and garages used by Presidio tenants, including the proposed underground garage at the Letterman Complex?

F. Air Quality and Noise

The analysis for both air quality and noise leave out the details of the project's contribution to cumulative impacts. The effects of increased bus traffic on local air quality, regional emissions, and noise in nearby City neighborhoods is missing in the discussion. Mitigations recommended for air quality violations state that the Draft Plan Alternative "would coordinate land uses to avoid conflicts due to odors and toxic air contaminants and would implement transportation control measures (TCMs) contained in the Clean Air Plan (CAP)." There is no mention of specific odors or toxic air contaminants in the Affected Environment section of the EIS. Reliance on compliance w ith existing regulations, monitoring at some future time does not take the place of impact analysis of the potential air quality effects from build out at the Presidio.

The EIS must address the secondary environmental effects that might occur from implementation of the mitigation measures. One of these secondary effects is the increase in transit, particularly on nearby residential streets. The EIS needs to include measures such as design changes, reduction in project size, or a decrease in square footage through demolition that would reduce air quality emissions and construction impacts, or relocation of project elements to disperse the impacts of potential pollution. The potential impacts from noise cause by "special events" or programs has not been adressed in the EIS.

G. Water Resources

There is no discussion of the potential impacts to groundwater resources, either in terms of current contamination or the effect of the various alternatives on groundwater quality or quantity. Projected potable water and irrigation demands do not identify both the average daily demand and the peak daily demand. Is the Presidio considering development of groundwater wells in either the Lobos or Marina Groundwater Basins?

Water Supply

The EIR does not address how the Presidio water supply demands would be met if its groundwater resources were lost. "Implementing a compensatory mitigation program" would not address such a loss, and it cannot be assumed that the SFPUC would be able to meet the Presidio's water demands. Would groundwater wells be developed, and if so, how much water would potentially be pumped and what would be the environmental consequences? What other alternatives have been identified to meet water demand? Best management practices are needed to reduce water consumption. Recycled water should be made available, and the use of potable water for landscaping should be minimized or eliminated.

We support the mitigation measure to construct a water recycling facility, but wonder why the minimum capacity (0.2 mgd) is not closer to the demand (1 mgd). Also, sanitary flows could be acquired from the SFPUC? How much landscape vegetation is planned park-wide for each alternative, and how much water will be needed to maintain this vegetation? How will groundwater quality be affected by the application of recycled water? The PTIP and the programmatic EIS should indicate where such a facility would be located relative to the Letterman Complex and other proposed facilities and to the nearby residential neighborhoods, which could be affected depending on the location of this facility.

If the Presidio is unable to meet their water demands through their own local resources and water purchases from the SFPUC, what alternative sources have been identified? As a retail water customer, the Presidio would be subject regulations imposed by the SFPUC during a water shortage, and to all mandatory water rationing programs and rates structures adopted during drought conditions.

Wastewater

The EIS does not describe how wastewater will be rerouted to the City's Westside system during wet weather. The City has not agreed to the rerouting of wastewater flows, and the EIS should address any secondary impacts associated with this rerouting.

Storm Water

The EIS does not discuss storm water infiltration, nor has it been quantified. Storm water flows discharged from the Presidio into the City system have not been quantified. The use of .85 in/hr rainfall intensity in runoff calculations is not standard practice, and the runoff calculation in Table 53 appears to be underestimated. The City uses 1.96 in/hr, which is the 10-year storm intensity for 15 minutes for San Francisco. The factor used for percentage of water entering the wastewater system is low. The City uses a factor of 90%, not 80%. What is the justification for using this number?

We appreciate the opportunity to comment on the Draft PTIP and EIS. Please don't hesitate to call me if you have any questions regarding the comments provided above, or if I can supply any information to assist your staff in preparing the final document.

Sincerely,

Paul Maltzer
Environmental Review Officer

Attachments:
Memo from San Francisco Planning Department, Transportation Planning
Comments of the San Francisco Public Utilities Commission, Planning Bureau
Memorandum and Email from the San Francisco Department of Parking and Traffic
Memoranda and Email from the Municipal Transportation Agency
Memorandum from the San Francisco Department of Public Works
Letter from the San Francisco Department of the Environment
Memorandum from the San Francisco County Transportation Authority
Resolutions passed by the Presidio Neighborhood Representative Work Group
Resolution No. 785-01, passed unanimously at the Board of Supervisors, October 22, 2001

cc.
Supervisor Leland Yee, Chair, Neighborhood Services and Parks Committee
Supervisor Tony Hall, Vice Chair, Neighborhood Services and Parks Committee
Supervisor Gerardo Sandoval, Member, Neighborhood Services and Parks Committee
Joan Girardot, Chair, Presidio Neighborhood Representative Work Group

PLANNING DEPARTMENT

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TO: Nannie Turrell, San Francisco Planning Department, Major Environmental Analysis

FROM: Daniel J. Pulon, San Francisco Planning Department, Major Environmental Analysis

DATE: October 2, 2001

SUBJECT: Comments on the Transportation Study for the Presidio Trust Implementation Plan

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I have read the above subject document, and have the following general and specific questions for your consideration:

GENERAL COMMENTS

1. The report indicated, under the rubric of the PTIP Planning Principles, that the traffic analysis of the project alternatives, except the Minimum Management, included the assumption of Transportation Demand Management (TDM) program goals. This assumption means that the amount of automobile traffic on the road would be reduced and shifted to other travel modes, such as to transit, across the board for all the land use alternatives.

   The Major weaknesses of this assumption lie in:

   - Assuming challenging TDM program goals in the traffic analysis before they are achieved, and without demonstrating their direct effectiveness to remove specifically vehicle trips from traffic streams, thereby masking larger project impacts at intersections;
     a. Where in San Francisco and elsewhere has this methodology been implemented?
     b. What are the project travel patterns and impacts without the TDM goals in place?
     c. How can quantifiable reductions, based on TDM program components, be made without quantifiably demonstrating the viability of the program components?
   - The lack of incentives to shift from single occupancy vehicles (SOV) to transit when parking supply exceeds demand for the alternatives.
     a. How will the Parking Management Program be implemented to shift single occupancy vehicles (SOV) to transit? Can this be quantified and substantiated?

b. What specific transit, shuttle, and other TDM program elements be implemented and when? How will the Presidio Trust financially contribute to any enhancements in MUNI service or other assumed external improvements?

2. The discussion that pertained to the linked and internal trips needs to be expanded to provide the basis and substantiation of the external, internal, and linked trip percentages identified in table A-1 in appendix A-2. Unless well substantiated, the industry standard for linked trip reduction is 10% for mixed-use developments.

   a. How were the internal/external percentages derived for each land use to equate to a reduction factor, ranging from 11% to16%, depending on the PTIP alternative?
   b. What mix of variables influenced the reduction factors, ranging from 11% to16%, depending on the PTIP alternative?

3. The report lacked land use/traffic circulation maps of all the alternatives. These maps are needed to evaluate the adequacy of the transportation/transit circulation system in supporting the land use alternatives, as well as displaying trip distribution percentages for each alternative.

   a. How are the various alternatives affecting the transportation circulation system? Will the road segments have capacity to support the land use mix?
   b. Will there be any auto/transit conflicts for any of the alternatives?

4. The Transit Impact discussion and analysis for each of the alternative should be expanded to include a table and discussion concerning existing and future transit capacities and Maximum Load Points (MLP) ridership along with transit rider ship demand of the project.

   a. How will the additional transit ridership of the alternatives affect existing and future rider ship at the Maximum Load Points (MLP)?
   b. To what extent should MUNI Lines' frequency be increased in order to reduce the transit impacts for each alternative? Please specify.

5. Caltrans and San Francisco County Transportation Authority (SFCTA) are examining various alternative alignments for Doyle Drive.

   a. How can any of the land use alternatives be adequately analyzed without considering the Doyle Drive alignments, since this report lacked an analysis of these alignments relative to each of the land use alternative with respect to transportation and transit impacts?
   b. Could the Doyle Drive alternatives have an affect on the internal transportation system in conjunction with any of the land use alternatives?

6. Having the following information in the Transportation Impact Section included for each intersection would provide the reader with an improved sense of project impacts:

   - Intersection figures with project volumes added and clearly identified;
   - Total cumulative volume growth (cumulative volume -existing volume) and;
   - Project's percentage contribution to the cumulative volume and growth

7. Several intersections have green time cycles less than ten (10) seconds for under un-mitigated and mitigated land use alternatives.

   a. Under these conditions, how can pedestrians safely cross?

8. There were several intersection calculation sheets that appeared to have errors (XXXXXX) within the turning movements. How is this explained? Are these errors? If so, how will these errors affect the results of the analysis

9. The Cumulative Effects Section indicated that it used the SFCTA model to assess PTIP impacts for the future (2020) based on ABAG's and MTC's land use and network, respectively. Are there any land use projects that are partially assumed in the model? If so, should they be fully considered in the cumulative analysis? If not, why?

10. In the Impacts Section, there were several statements that some intersection improvements were beyond the Trust's jurisdiction. Does this statement imply that the Trust is not responsible for those intersection improvements, since these intersections are within the City's jurisdiction? Please explain.

11. In the Mitigation Section, there is a statement under several mitigation measures that the Presidio Trust would coordinate with City to determine the contribution of each party to the cost of the improvements.

    a. What does this mean?
    b. How will this be done?
    c. Who will have implementing responsibility?

12. The Mitigation Section was reticent about having a phased mitigation plan while implementing any portion of the plan alternatives.

    What would the level of impacts and mitigations be when any of the plan alternatives are developed in phases and in concert with a Doyle Drive alternative?

SPECIFIC COMMENTS

1. Page 1-4. The Transit discussion indicated the project would provide shuttle from project recreational areas to San Francisco attractions. What is the extent of this service in terms of frequency, headways, and projected rider ship? Will this service be coordinated with MUNI since the report indicated that the Golden Gate Concourse Authority is coordinating this service with the City? What is the existing ridership on scheduled shuttle services to and from the Presidio?

2. Page 3-3. Table 3-2 should use the following City's person trip generation rates:

   - Office 18.1 @ sq.ft. Daily person trip rate and 8.5% of daily person trips for pm peak; and
   - Residential 17.3% of daily person trips for pm peak

   Why were not the City's rates used?

3. On page 3-11, on the discussion of short-term parking turn over rates, there was a statement that indicated that 6 vehicles per space per day was used for most of the land uses; and in some cases as high as 10 vehicles per space per day; and as low as 3 vehicles per space per day.

   a. What is the source of these turnover assumptions?
   b. Are these rates based on San Francisco survey data?
   c. What was the reason for not using the City 's turnover rates?

   The City generally uses 5.5 vehicles per space per day, based on surveys in the City.

4. Page 4-3, Table 4-1 is confusing: Is Year 2000 referring to GMPA 2000 Alternative or Existing conditions?

5. Page 4-6.Regarding the discussion about Park Presidio Blv./Lake St. and Park Presidio Blv/ California St. intersections: Providing the project's contribution traffic relative to the total volume alone, amounting to 2% under the GMPA 2000 alternative, does not fully describe the project's impact:

   a. What is the project's traffic contribution relative to the intersections' cumulative volume growth (project's contribution/(2020 volume – 2000 volume))?
   b. Is the project substantially contributing to the intersections' critical movements?

   Regarding the discussion on regional growth relative to Park Presidio Blv./Lake St. and Park Presidio Blv/ California St. intersections:

   a. What is the 11% increase in pm peak hour traffic volume based on?
   b. Should the traffic analysis also include evaluation of the Doyle Drive alternatives, because of the traffic flow constraints stated in the text?

   Page 4-15.Regarding the discussion about Public Transportation:. How can there be the assumption that of the 17% of the project generated transit trips with the assumption that MUNI will absorb 75-80% of the transit trips when infrequent transit service is available in the area?

   Regarding the discussion about the GMPA 2000 Alternative: There was a statement that 82X Presidio/Wharves Express, 43-Masonic, 29–Sunset, and 28-19th Ave. have available capacity in the vicinity of the presidio and MLP.

   a. Since Table A-34 does not show MLP capacity, what is the capacity for existing and future conditions at the MLP?
   b. Will the project contribute to the exceedence of MLP capacity?
   c. If, so, to what extent?

   Please explain in more detail and with specifics about the adopted GMPA EIS mitigation measures supporting increased MUNI frequencies that would enhance transit service to the Presidio and increase the capacities on the above lines. Would the Trust provide financial support for increased services and capacities?

7. Page 5-5. Regarding the mitigation measure (TR 3) to remove on street parking on the east side of 25th Avenue to provide a right turn lane and traffic signal:

   a. Would this improvement interfere with existing bicycle lane operations at that location?
   b. Would this improvement interfere with TR- 9 in that TR-3 would become a barrier to a bicycle lane?
   c. If so, could the improvement be modified to avoid impeding the bicycle facility?

8. Page 5-9. Regarding the TDM Program mitigation (TR-19) measure:

   a. How can the elements (either separately or in combination) of the program support the high mode shifts assumed in the traffic analysis without substantiation?
   b. Since this is a mitigation measure:
      1) What is the reasoning for assuming this as part of the project description and assumed in the traffic analysis?
      2) What are the traffic impacts without this as a mitigation measure?
   c. How will the City be able to monitor the enforcement of this measure?

9. Page 5-9. Regarding the Special Event Parking Management Program mitigation (TR-21) measure:

   a. Will the City apprised and coordinated when special events occur?
   b. How will the City be able to monitor the enforcement of this measure?

10. Page 5-10. Regarding the Support of Increased MUNI Frequency mitigation (TR-10) measure:

    a. How will this measure to increase frequency of service on existing MINI Lines occur?
    b. Will NPS provide financial support for increased transit services or line extensions?

If you have any questions pertaining to the above, please contact me at (415) 558-5978.

Water Resources

The Environment Consequences discussion does not address directly groundwater contamination at the Presidio. How might the implementation of the various alternatives affect groundwater quality and quantity? Is there a current problem with groundwater contamination? If so, what is being done to address the problem, how might this contamination affect future water supply resources, and how would the implementation of the various alternatives affect existing groundwater contamination, if any?

NR-18, p. 266. "If it is not feasible to avoid losses to . . . associated groundwater resources . . . ." how would "implementing a compensatory mitigation program" address the potential loss of the groundwater resources to meet Presidio water supply demands? Please identify how Presidio water supply demands would be meet if its groundwater resources were lost. It cannot be assumed that the SFPUC would be able to supply all of the Presidio's water demands if the Presidio lost its groundwater resources.

Is the Presidio considering development of groundwater wells in either the Lobos or Marina Groundwater Basins? If so, identify the quantity of water to be pumped and whether water would be used to meet potable or non-potable demands as well as other potential environmental consequences.

How might stream restoration projects impact groundwater conditions?

Water Supply and Demand

Projected potable water demands only identify the average daily demand. Please identify the peak daily demand, both for wet weather and dry weather conditions. In addition, projected irrigation demands only identify the peak daily demand; please identify the average daily irrigation demand for dry weather conditions.

The recycled water plant will have a minimum capacity of 0.2 mgd [p.350]. However, the peak irrigation demand is estimated to be 1 mgd [p. 345]. Why is the minimum capacity of the recycled plant not nearer the irrigation demand of 1.0 mgd? How does the Presidio anticipate meeting the additional demand for 0.8 mgd of non-potable water demand? If production of recycled water is thought to be limited to Presidio sanitary flows, has consideration been given to acquiring sanitary flows from SFPUC?

Could recycled water be used to maintain the minimum Lobos Creek flow of 0.5 mgd, thus allowing the Presidio to divert addition creek flows to meet potable demand?

Groundwater basins in the Presidio are shallow; how will the application of recycled water in Presidio affect groundwater quality?

How will recycled water be used and/or discharged during wet weather?

Comments of the SFPUC/Planning Bureau
On the Presidio Trust Draft Environmental Impact Statement
October 17, 2001

If the Presidio is unable to meet their water demands through their own local resources and water purchases from the SFPUC, what other alternatives have been identified to meet water demand?

As a retail water customer, the Presidio will be subject to (1) all the rules and regulations implemented by the SFPUC during a water shortage and (2) all mandatory water rationing programs and rate structures adopted during drought conditions.

Wastewater Treatment and Disposal

Have toxic sediments been found in the course of sewer inspections and maintenance. If so has a plan been developed for removing these sediments?

Is there a comprehensive plan to rehabilitate the sanitary collection system? Is there a repair and replacement program, or is one planned? What is the current annual budget for this work?

The statement on page 210 that the sewers leading to the Southeast plant are the limiting factor in treatment capacity is incorrect.

The statement on page 353 that rerouting wastewater to the City's westside system during wet weather would help limit CSOs needs to be investigated and substantiated.

Storm Drainage

UT-5 Pg. 350: There is no specific mention of system-wide infiltration. Is there evidence of infiltration? If so, has it been quantified? Is a study planned?

Please quantify the stormwater flows discharged to the San Francisco City system. Please clarify if the total sanitary flow quoted includes any combined flows or Westside flows.

Please justify the use of 0.85 in/hr rainfall intensity in runoff calculations. Standard practice calls for using an intensity appropriate for the time of concentration. Runoff calculations in Table 53 on page 351 seem to be underestimated.

Please justify the assumption in calculations that 80% of water used (excluding irrigation) enters the wastewater system. The City uses a factor of 90%.

SAN FRANCISCO
DPT
DEPARTMENT OF PARKING & TRAFFIC
Traffic Engineering Division
City and County of San Francisco
WILLIE LEWIS BROWN, JR., MAYOR
FRED M. HAMDUN, EXECUTIVE DIRECTOR

MEMORANDUM

TO: Nannie Turrell

THROUGH: Bond M. Yee
Deputy Director and City Traffic Engineer

FROM: Jerry Robbins

SUBJECT: Comments on Presidio Trust Implementation Plan Draft EIS

DATE: September 20, 2001

We have reviewed the draft EIS on the Presidio Trust Implementation Plan dated July 2001 and the Presidio Trust Draft Implementation Plan dated July 2001 and have the following comments:

EIS COMMENTS

Summary Information

Page S-19 through S-21, Table S-1: In order to help understand the magnitude of the project's impacts, this table should provide figures indicating the current number of daily vehicle trips, parking spaces, pedestrian and bicycle trips and transit trips generated in the Presidio. The report should clearly identify what trips are included in the "daily vehicle trips" shown on page S-19. Do these vehicle trips include internal vehicle trips? Do they include trips generated by the approved Letterman Digital Arts (LDA) project? Do they include growth in through traffic or growth in traffic generated in Area A? The report needs to clarify how the "daily vehicle trips" shown on Table S-18 differs from the traffic volumes entering and exiting Presidio gates shown on Table 27 on page 187. The report should indicate how many people currently work in the Presidio and how many would work there under each alternative. The report should also indicate how many people currently live in the Presidio and how many will live there under each alternative.

Alternatives

Page 3, Figure 1: Interstate 680 is misidentified as Interstate 580.

(415) 554-2300 FAX (415) 554-2352 25 Van Ness Ave., Suite 345 San Francisco, CA 94102-4576

Page 27, Figure 4: The buildings and roads in the Wherry Housing area are not shown on this map, but are shown on Figure 6, 8, 10 and 12, even though the South Hills box indicates that Wherry housing would be removed under each of these alternatives. Is this an error?

Pages 25, 33, 43, 49, 57 and 63: These maps are not very helpful in understanding the differences between the various alternatives. Figures 5 and 11 are almost identical, and the others require the reader to hunt to find the differences. Do all alternatives assume the construction of the Letterman Digital Arts (LDA) project?

Affected Environment

Page 151, Figure 27: The map shows some roadways that no longer exist, such as Berry Street between 2nd and 3rd Streets at Pacific Bell Park and the Oak Street on-ramp to the Central Freeway. The map shows some downtown streets making several odd 90-degree turns that do not exist.

Page 185, Figure 29: This figure shows one circle around the intersection of Doyle Drive, Marina Boulevard, Lyon Street and Mason Street, while it is listed as two separate intersections on page 189 and elsewhere. The 1994 Presidio Transportation Planning and Analysis Technical Report treated this area a single intersection, and said it was operating at an existing Level of Service of E during the PM peak hour (page III-22), and recommended improvements of this intersection, shown on page VI-3. Page 193 of the PTIP evaluates this area as two intersections, both of which are currently operating at LOS B. The EIS needs to reconcile these conflicting assessments. Are improvements to this intersection needed to accommodate future traffic volumes?

Page 194, Transit Services: Has the Presidio conducted mode split surveys of existing employees to determine the percentages that currently drive alone, carpool, use transit, walk or bicycle to work?

Page 195, Figure 31: This map should show the Golden Gate Transit bus routes and the Muni and GGT bus stop locations.

Page 201, Presidio Internal Shuttle: The Presidio shuttle bus operations discussed should be mapped. Where are the "key transfer points" between systems? Is this a free service? Who funds this system? Does the shuttle operate on city streets? Does the system comply with existing city restrictions in place on several nearby streets?

Page 201, Tour Buses and Charter Services: The section should describe existing tour bus restrictions on city streets. This subject needs to be addressed in the Environmental Consequences section of the EIS as well, but is not. How many additional tour buses will be attracted to the Presidio in the future? The

privately operated Gray Line/Coach USA Trolley Hop route that serves the Presidio should be described. How many people use this service to access the Presidio? What is the potential for a cultural shuttle (mentioned on pages 49 and 50 of the Presidio Trust Draft Implementation Plan) to reduce visitor-generated traffic to the Presidio? What is the status of the tour bus management plan referred to page 50 of the Presidio Trust Draft Implementation Plan?

Environmental Consequences

Page 319, 2nd and 3rd paragraphs: The Doyle Drive project description needs a map. Girard Road, which is described as the location of an important Doyle Drive/Presidio interchange, is not labeled on any maps in the EIS. When is the reconstructed Doyle Drive likely to be built? Where would the Presidio transit center be located? How convenient would the transfers be?

Page 319, 4th paragraph, last sentence: Is "the existing roadway between Gorgas Avenue and Lyon Street" under Presidio jurisdiction?

Page 324, Table 45: The table is helpful in comparing existing and projected traffic volumes, but it does not indicate the amount of new traffic generated from the proposed project, growth in through traffic and growth from development outside Area B. Is additional traffic generated by the LDA included in these totals? What percentage of the growth of traffic is attributable to the proposed project? What assumptions regarding growth and development outside the Presidio were applied? Explain "cut through traffic (%)" in more detail. Do the projected volumes for the "15th Avenue" gate include traffic that would use 14th Avenue if this gate were reopened? Do these volumes warrant opening of the 14th Avenue gate?

Page 323, right column, intersection table: Show the existing LOS on these tables for the intersections described.

Page 324, Table 45: What percentage of the traffic growth between "Existing Conditions" and each alternative is attributable to development in the Presidio versus "background" growth?

Page 325, Table 46: The table should indicate that for two-way stop controlled intersections, the LOS is presented for the worst approach, as done on Table 29, page 193.

Page 330, Parking: The Background Transportation Report indicates on page 3-11 that the parking demand figures only include non-housing parking demand. What is the total parking demand and supply by alternative if parking for housing is included? Do any other transportation estimates also exclude housing?

Page 337, Section 4.5.5 Construction Traffic: Construction truck traffic should be instructed not to use the 25th Avenue, Presidio, Mason Street, 15th Avenue, and Arguello gates. This should be written into the construction contracts.

Page 340, Parking: Is parking limited for the Letterman Digital Arts (LDA) development? Will employees have to pay for parking, or will it be free? What Transportation Demand Management programs will be employed at LDA?

Transportation Mitigation Measures

Several of the mitigation measures may not be feasible. Drawings showing exactly what is being is proposed are needed to evaluate their feasibility.

Page 338, TR-1, Presidio Avenue/Pacific Avenue Intersection: Tables 46 and 47 indicate that this intersection will fall to LOS E or F in both the AM and PM peak hours. However, page 338 only refers to a PM peak-hour problem. On which approaches are turn lanes and parking removals required? Presidio Avenue is 38 feet 9 inches wide. Removing on-street parking would not provide sufficient space for two moving lanes in each direction, particularly with Muni buses operated on three of the four approaches. How many parking spaces would be removed? Even if this intersection were signalized and on-street parking were removed, the same traffic conditions would occur at other nearby intersections such as Presidio Avenue at Jackson Street and Presidio Avenue at Washington Street. Both of these intersections are also existing 4-way STOP sign controlled intersection and would presumably need to be signalized as well. Presidio is a *boulevard* within the Presidio and an *avenue* within the city.

The Department of Parking and Traffic has very limited funding for new traffic signals and there is great competition for these funds. It is unlikely that DPT would be able to fund a substantial amount of the costs for any of the signals proposed in this EIS, not to mention the adjacent intersections that are not analyzed.

Page 339, TR-2, Arguello Boulevard/Jackson Street Intersection: As with the Presidio Avenue/Pacific Avenue mitigation measure, this measure would resolve the congestion problem at one intersection but do nothing for the adjacent intersection of Arguello Boulevard/Washington Street, which would have the same congestion problems but was not analyzed in the EIS.

Page 339, TR-3, Lincoln Boulevard/25th Avenue/El Camino del Mar: The proposal to add a turn lane on the northbound approach of 25th Avenue by removing parking does not take into account the existing bicycle lanes on both sides of 25th Avenue and the turning radius needs of large vehicles. The creation of a turn lane on northbound 25th Avenue would require removal of the existing bicycle lane. Is this consistent with the Presidio's bicycle and pedestrian plan?. Muni buses and other large vehicles making the right turn from northbound 25th

Avenue onto eastbound El Camino del Mar already have a difficult time making the turn without swinging into the westbound left turn lane of El Camino del Mar. If these vehicles had to begin their turn closer the east curb of 25th Avenue, this turn would become more difficult. This mitigation measure requires more analysis.

Page 341, TR-11, 14th/Avenue/Lake Street Intersection Improvements: This proposed mitigation measure might cause more problems than it resolves. It should be emphasized that only one approach of the intersection has a poor LOS and the Lake Street approaches do not stop. We have not found the HCM method of evaluating two-way STOP controlled intersections to be particularly reliable. This intersection requires more analysis. Which approach has the LOS problem? How many trips are projected to be added to this approach?

Page 342, TR-12, Lyon Street/Lombard Street Intersection Improvements: The third paragraph states that there is 30 feet of width between the historic columns at the Lombard gate, and that this is enough room for three 11-foot wide lanes. Presumably, this should be changed to three *10*-foot wide lanes. We do not recommend 10-foot wide curb lanes adjacent to fixed objects. Turn prohibitions would not he helpful, as the columns are set back from the Lyon/Lombard intersection.

Page 342, TR-15, 14th Avenue/California Street Intersection: Similar to 14th Avenue/Lake Street, we question the need for improving the northbound or southbound approaches to this intersection. A signal at this location could delay Muni buses on California Street. Could traffic destined for the 14th Avenue gate to the Presidio be routed on a different route? How much of the traffic at this intersection is attributable to the Presidio?

Page 343, TR-17 25th Avenue/California Street Intersection: How much on-street parking would be removed by this mitigation measure?

Page 343, TR-19, Transportation Mitigation Measures: Other possible measures include participation in the city CarShare program, employer participation in the Commuter Check program, and free transit passes for employees. Maximizing the number of Presidio employees who also live in the Presidio could also reduce transportation demand. What efforts are proposed to give Presidio employees priority in living in Presidio residences? Bicycle use could be encouraged by providing showers and lockers at major employment centers, and by providing bicycle racks on shuttle buses and other transit vehicles.

Page 343, TR-20, Reduce Parking Supply: According to Table 33 on page 202, there are currently 7,790 parking spaces at the Presidio. However, page 343 indicates that parking would be *reduced* to between 9,000 and 11,000 spaces. Is residential housing included in either of these figures?

Page 343, TR-21 Special Event Parking Management: What types and sizes of special events are envisioned, and where within the Presidio would they take place? Where would overflow parking be located?

PRESIDIO TRUST DRAFT IMPLEMENTATION PLAN COMMENTS

Appendix D, Page D3: The second paragraph on the parking management plan says this program "should include...employer/visitor parking fees paid directly by individual drivers rather than by non-residential tenant employers..." This is potentially a very powerful measure to discourage auto use by Presidio employees. However, it is not mentioned on the pages D6 as a measure to be required of Presidio tenants. How can the Presidio assure that tenant employees pay for parking if it is not required in the tenant leases? Will the Presidio Trust control all the parking lots and garages used by Presidio tenants? Will employers be required to provide bicycle parking and showers and lockers for bicycle riders?

JR/presidioEIS

Nannie:

I would like to add the following comment to our September 20, 2001 comment
letter on the Presidio Trust Implementation Plan EIS;

Page 328, 2nd paragraph, 2nd sentence: The report says: The GMPA 2000
alternative would be expected to contribute less than two percent to the total
p.m. peak hour traffic volumes at these two (Park Presidio Boulevard)
intersections..." Why doesn't the report isolate the Presidio's traffic
impacts for other impacted intersections and quantify the Presidio's
contribution of future traffic volumes and impacts on intersection LOS? Why
aren't the impacts of the other alternatives, besides the GMPA 2000 alternative,
quantified for these and other intersections?

Thanks,

Jerry

San Francisco Public Transportation Department
949 Presidio Avenue, San Francisco, CA 94115 415.673.6864

MEMORANDUM

To: Paul Maltzer, Planning Department

From: Peter Straus, Manager of Service Planning
James D. Lowé, Transit Planner

Subject: Presidio Trust Implementation Plan – Draft EIS; July 2001
2000.383E

Date: 20 Sep 01

The San Francisco Municipal Railway Service Planning staff have the following comments regarding the Presidio Trust Draft EIS.

Our first comments are general in nature.

First, we take note that this plan is primarily a policy and land-use plan. From a perspective of assessing transportation needs and impacts, we believe it would be much more useful if it were an integrated land-use and transit plan. For example, extensive efforts have been expended over the past several years on the replacement for Doyle Drive and the associated transit center proposal. This is mentioned only briefly in this report. We would recommend that the proposals such as this, and other transit proposals, be closely integrated with the plan's proposals and updated in that context.

Similarly, for the most part the plan and the environmental document address Area B, without considering adjacent development in and impacts from Area A. This is problematic in that impacts of Presidio development will be caused by usage in both Areas A and B. Cumulative analyses incorporating at least some reasonable assumptions for Area A are needed to give a valid perspective, especially in transportation where recreational trips are a significant portion of the whole.

Generally, it is difficult to comment on the specifics of the plan since six (6) or more alternatives are still being considered. What we have attempted to review is how development of the Presidio Plan will impact the demand for transit in the Park. We have also attempted to discern if available transit services will serve activity centers and transit generators in the Presidio.

Finally, we would like to note that we have just yesterday received excerpts from WSA's Background Transportation Report. Review of this document is not reflected in these comments.

Specific comments follow:

Page	Comment
P. S-18	Visitor Experience – The summary indicates that between 3.7 million (or 10,000 per day) to 8.4 million (23,000 per day) visitors will come to the Presidio depending on the alternative implemented. We note that recreational facilities can generate weekend peaks which significantly exceed weekday peaks—MUNI's 76-Ft. Cronkhite is a case in point. As noted above, such an analysis does, however, need to encompass both Areas A and B. Have weekend travel impacts been examined at all?
P. S-19	Increased Congestion – The summary indicates that under the various alternatives many intersections will operate at level E or F, virtually at a stand still. The impacts on transit operations specifically are not discussed. Can the congestion impacts on transit be mitigated?
P. S-21	Transit Demand – The summary indicates that each of the proposed alternatives will result in additional daily transit trips. These range from an additional 12,100 for the GMPA plan to 22,000 a day for the Cultural Destination approach. What is not clear is at what date these levels might occur. Should we assume 2013 the year of mandated financial self-sufficiency or 2020?
P. 195	Figure 31 shows the existing Muni routes in the Presidio. A map needs to be developed that indicates the location of various transit hubs and planned transit services in the Presidio. This should include routing of the internal shuttle; any Golden Gate Transit routes; future proposed Muni extensions; possible employer provided shuttles.
P. 198-199	The discussion acknowledges that many Muni lines are quite heavily used at their maximum load points (MLPs), but discounts Presidio impacts because loads are lower within the Presidio itself. We cannot support that conclusion, and have estimated, for lines heavily used for Presidio trips, the portions of Presidio ridership which have impacts at the MLPs. This analysis is appended to these comments, and describes the impacts associated with both the least and most intensive PTIP alternatives. (See also comments for Page F-10 below.) We do want to acknowledge the line-by-line ridership estimates provided on Pages 199 and F-9, which permit a more thorough assessment than the data typically contained in such documents.
P. 318	TDM – The section summarizes elements of the Transit Demand management Program. A section should be developed entitled " Future Transit Improvements". This new section should identify potential increases in transit

	service or route extensions to be provided by the various transit operators. Currently, only brief statements are scattered throughout this document and the Draft Implementation Plan, i.e. Express bus service to regional transit connections (e.g., BART, Transbay Terminal). No explanations or justifications are offered. Again, transit service development should be more tightly integrated with the PTIP alternatives.
P. 322	Table 44 – Does this table show estimated cumulative (existing + future) trip generation or increased demand only? Is this for 2013 or 2020? The table indicates that transit will carry 20% of mode split. Will this conform to the goals of the adopted plan?
P. F-1 to 6	Appendix F – It is difficult to reconcile the Appendix that indicates peak travel with Table 50, Page 334, that totals those numbers for the entire Presidio. Do these tables indicate future increases in demand? Please also define Inbound and Outbound in the notes.
P. F-9, 10	2020 Presidio Peak Ridership – The tables show projected 2020 ridership on various Muni lines that run near and into the Presidio—an analysis incidentally which appears well done and which we commend. As noted earlier (P. 198-199) Muni staff compared projected ridership levels at the Maximum Load Point (MLP) and at the Presidio during the peak hours for affected lines. This analysis, which is attached, identifies and suggests the need for more coaches to be added to certain lines. We have prepared and attached a summary table to put these impacts in perspective. Using the most transit intensive scenario, "Cultural Destination" for the most heavily used lines, this summary suggests Presidio development could generate needs for up to 21 peak period operator assignments ("runs") and, including spares, 25 additional vehicles. Associated capital costs, even not including any facility needs, could reach approximately $8.75 million, with annual operating costs of $5.6 million.
P. F-12	We were somewhat surprised to find this table back here, which does tabulate Area B as well as Area A trips. As noted above, we would have liked to have seen these combined figures explicitly used as the basis of the transportation impact analyses.

Attachments (2 pages)

cc: Lisa Mancini, Laura Spanjian, JDL, PS, SPChron

PS/JDL: presidio EIS--019.doc

Average 2020 Peak Hour Impact of Lowest/Highest Presidio Alternatives
On Six Muni Lines Assuming No Increase in Bus Services

Lowest Impact Alternative

AM Peak Inbound Line	Buses per Hour	Current Avg. MLP Load	(+15%) 2020 MLP	Current Avg. Presidio load	2020 Presidio	GMPA 2000	% new Riders thru MLP	New MLP Riders per Bus	New Avg. Load at MLP	Riders Over 63 Pass. per Bus	Total excess Riders	New Presidio Riders per Bus	New Avg. Load Presidio	Riders Over 63 Pass. per Bus
28	5	35.0	40.3	23.0	26.5	123	75%	18.5	58.7	n/a	n/a	24.6	51.1	n/a
29	4	45.1	51.9	9.0	10.4	149	50%	18.6	70.5	7.5	30.0	37.3	47.6	n/a
30	15	50.5	58.1	2.0	2.3	18	50%	0.6	58.7	n/a	n/a	1.2	3.5	n/a
41	6	48.8	56.1	3.0	3.5	10	50%	0.8	57.0	n/a	n/a	1.7	5.1	n/a
43	5	56.5	65.0	15.0	17.3	173	50%	17.3	82.3	19.3	96.4	34.6	51.9	n/a
82X	3	44.5	51.2	5.0	5.8	145	100%	48.3	99.5	36.5	109.5	48.3	54.1	n/a

PM Peak Outbound Line	Buses per Hour	Current Avg. MLP Load	2020 MLP	Current Avg. Presidio load	2020 Presidio	GMPA 2000	% new Riders thru MLP	New MLP Riders per Bus	New Avg. Load at MLP	Riders over 63 Pass. per Bus	Total excess Riders	New Presidio Riders per Bus	New Avg. Load Presidio	Riders Over 63 Pass. per Bus
28	5	47.1	54.2	35.0	40.3	100	75%	15.0	69.2	6.2	30.8	20.0	60.3	n/a
29	4	46.7	53.7	20.0	23.0	122	100%	30.5	84.2	21.2	84.8	30.5	53.5	n/a
30	12	55.3	63.6	3.0	3.5	27	50%	1.1	64.7	1.7	20.6	2.3	5.7	n/a
41	10	25.2	29.0	2.0	2.3	15	50%	0.8	29.7	n/a	n/a	1.5	3.8	n/a
43	6	34.2	39.3	16.0	18.4	138	100%	23.0	62.3	n/a	n/a	23.0	41.4	n/a
82X	3	27.6	31.7	5.0	5.8	116	100%	38.7	70.4	n/a	n/a	38.7	44.4	n/a
A	B	C	D Cx115%	E	F Ex115%	G	H	I G/BxH	J D+I	K J-63	L KxB	M G/B	N M+F	O N-63

Maximum Load Points

Line		AM Peak Inbound Line
28	19th/Holloway - AM - IB 19th/Holloway - PM - OB	28
29	Geneva BART - AM - IB Geneva BART - PM - OB	29 30 41
30	Stockton/Sutter - AM - IB Stockton/Sutter - PM - OB	43 82X
41	Union/Columbus - AM - IB Union/Columbus - PM - OB	PM Peak Outbound Line
43	Geneva Mission - AM - IB Masonic/Haight - PM - OB	28 29 30 41 43 82X
82X	4th/Townsend - AM -IB Beale/Mission - PM -OB	

(Note: For these purposes, loads on 43-line at Masonic/Haight and Geneva/Mission should be considered identical.)

Highest Impact Alternative

Cultural Destination	% New Riders thru MLP	New MLP Riders per Bus	New Avg. Load at MLP	Riders Over 63 Pass. per Bus	Total excess Riders	New Presidio Riders per Bus	New Avg. Load Presidio	Riders Over 63 Pass. per Bus	Total excess Riders
184	75%	27.6	67.0	4.8	24.3	36.8	63.3	0.3	1.3
223	50%	27.9	79.7	16.7	67.0	55.8	66.1	3.1	12.4
32	50%	1.1	59.1	n/a	n/a	2.1	4.4	n/a	n/a
18	50%	1.5	57.6	n/a	n/a	3.0	6.5	n/a	n/a
253	50%	25.3	90.3	27.3	136.4	50.6	67.9	4.8	24.3
212	100%	70.7	121.8	58.8	176.5	70.7	76.4	13.4	40.3

Cultural Destination	% new Riders thru MLP	New MLP Riders per Bus	New Avg. Load at MLP	Riders Over 63 Pass. per Bus	Total excess Riders	New Presidio Riders per Bus	New Avg. Load Presidio	Riders Over 63 Pass. per Bus	Total excess Riders
201	75%	30.2	84.3	21.3	106.6	40.2	80.5	17.5	87.3
245	100%	61.3	115.0	52.0	207.8	61.3	84.3	21.3	85.0
70	50%	2.9	66.5	3.5	42.1	5.8	9.3	n/a	n/a
38	50%	1.9	30.9	n/a	n/a	3.8	6.1	n/a	n/a
270	100%	45.0	84.3	21.3	128.0	45.0	63.4	0.4	2.4
226	100%	75.3	107.1	44.1	132.2	75.3	81.1	18.1	54.3
P	Q	R	S R+D	T S-63	U TxB	V P/B	W V+F	X W-63	Y XxB

Estimate of Costs Associated with PTIP High Impact (Cultural Destination) Alternative

AM Peak Inbound Line	Pk Hr Total excess Riders	Pk Hr Coach Demand Increase	Pk Period Coach Demand Increase
28	24.3	1	2
29	67.0	2	4
30	n/a	0	0
41	n/a	0	0
43	136.4	3	6
82X	176.5	3	3
Totals		9	15

Capital Costs

21 + 20% = 25 coaches
25 x $350,000 = $8,750,000

Operating Costs

21 runs x 8 hrs x 6 days x 52.1 wks = 52516.8 veh. hrs
(assumes 50% Sa-Su needs)

52516.8 VH x $107.55 = $5,648,182 annually

PM Peak Outbound Line	Pk Hr Total excess Riders	Pk Hr Coach Demand Increase	Pk Period Coach Demand Increase
28	106.6	2	4
29	207.8	4	8
30	42.1	1	2
41	n/a	0	0
43	128.0	2	4
82X	132.2	3	3
A	U TxB	12	21

Date: 10/2/01 3:02 PM
Sender: Peter Straus
To: Nannie Turrell; Paul Maltzer
cc: James Lowe
Priority: Normal
Receipt requested
Subject: PTIP Comments

Here are two additional comments on the PTIP EIS--the first just summarizing
comments and subsequent discussion at the working group meeting last Friday:

1. Costs associated with mitigations are not going to be independent of the
development alternative implemented, and should not be treated as a constant.
For example, see the table submitted with our original comments on 20 Sep 01.

We would like to see a financial plan which reflects these differential costs,
and then goes the next step and identifies, to the extent all development
scenarios are projected to be able to meet the fiscal sustainability targets,
can they generate a revenue stream sufficient to offset the cost impacts of
mitigation strategies such as increased transit service? In other words, do the
various development alternatives generate a sufficient revenue stream to offset
both the costs of Presidio Park operations, and the costs of each alternative's
specific mitigation requirements?

2. In Appendix F, it is not indicated explicitly what the baselines are.
For example, in Tables F-4 and F-5, pp.F-9 & 10, are these ridership volumes
over and above year 2000 actuals for Area B (our assumption)? Or do they
include some unstated levels of current ridership? (This is similar to our
comment on p.322 in the main text.)

MEMORANDUM

To: Paul Maltzer, Planning Department

From: Peter Straus, Manager of Service Planning, MUNI
James D. Lowé, Transit Planner

Subject: Presidio Trust Implementation Plan – Draft EIS; July 2001
2000.383E

Date: 22 Oct 01

The following MUNI comments supplement those transmitted on 20 Sep 01. The first two are those transmitted earlier in a 2 Oct 01 e-mail; the third is new but augments earlier comments.

1. Costs associated with mitigations are not going to be independent of the development alternative implemented, and should not be treated as a constant. For example, see the table submitted with our original comments on 20 Sep 01.

   We would like to see a financial plan which reflects these differential costs, and then goes the next step and identifies, to the extent all development scenarios are projected to be able to meet the fiscal sustainability targets, can they generate a revenue stream sufficient to offset the cost impacts of mitigation strategies such as increased transit service? In other words, do the various development alternatives generate a sufficient revenue stream to offset both the costs of Presidio Park operations, and the costs of each alternative's specific mitigation requirements?

2. In Appendix F, it is not indicated explicitly what the baselines are. For example, in Tables F-4 and F-5, pp.F-9 & 10, are these ridership volumes over and above year 2000 actuals for Area B (our assumption)? Or do they include some unstated levels of current ridership? (This is similar to our comment on p.322 in the main text.)

3. On 20 Sep 01, we transmitted two tables estimating the impacts of added MUNI service required to address PTIP EIS alternatives, and associated costs. Attached are two additional tables, representing a similar analysis for the Draft PTIP alternative. Associated costs are estimated at $7.35 million in capital costs for 21 vehicles, with annual operating costs estimated at $4.6 million.

   Note that we remain unclear as to what generators are and are not included in Appendix F Tables 4 and 5; if Area A and the Lucas Digital project have not been included, total Park costs could be higher.

Attachments (2 pages)

cc: Lisa Mancini, Laura Spanjian, JDL, PS, SPChron

PS/JDL: presidio EIS—01X doc

Estimate of Costs Associated with PTIP High Impact (Cultural Destination) Alternative

AM Peak Inbound Line	Pk Hr Total excess Riders	Pk Hr Coach Demand Increase	Pk Period Coach Demand Increase	
				Capital Costs
28	18.5	1	2	17 + 20% = 21 coaches
29	62.0	1	2	21 x $350,000 = $7,350,000
30	n/a	0	0	
41	n/a	0	0	**Operating Costs**
43	130.9	3	6	
82X	166.5	3	3	17 runs x 8 hrs x 6 days x 52.1 wks = 42513.6 veh. hrs (assumes 50% Sa-Su needs)
Totals		8	13	
				42513.6 VH x $107.55 = $4,572,338 annually

PM Peak Outbound Line	Pk Hr Total excess Riders	Pk Hr Coach Demand Increase	Pk Period Coach Demand Increase
28	70.6	2	4
29	149.8	3	6
30	32.1	1	2
41	n/a	0	0
43	63.0	1	2
82X	77.2	2	3
A	L	9	17
	KxB		

City and County of San Francisco

Willie Lewis Brown, Jr., Mayor
Edwin M. Lee, Director

(415) 554-8345
FAX (415) 554-8308
http://www.sfdpw.com

Department of Public Works
Bureau of Engineering
Hydraulic Engineering
1680 Mission Street, 2nd Floor
San Francisco, CA 94103-2414

Ken Sin, Acting Section Manager

MEMORANDUM

To: Nelson Wong
Acting Bureau Chief

Date: September 27, 2001

From: Kenneth Sin
Acting Section Manager

Subject: Presidio Trust Draft Implementation Plan and EIR Review Comments

WASTEWATER TREATMENT AND DISPOSAL
Methodology (p. 345)
Is there a maximum wastewater flow limit in the agreement between the City and the Trust?

MITIGATION MEASURES
New Mitigation
UT-6 *Resource Consolidation (p. 353)*
Did the Trust confer with the City regarding the rerouting of wastewater flows from the eastern Presidio to the western side of the City?

STORM DRAINAGE
Methodology (p. 353)
The Presidio Trust staff used 0.8 inches per hour (IPH) as the design storm (a 10-year one hour storm intensity).

We expect that the time for the peak flow to reach the outfalls or City sewer system is about 15 minutes. We recommend using 1.96 IPH, which is the 10-year storm intensity for 15 minutes for San Francisco.

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Customer Service Teamwork Continuous Improvement

Date: 10/5/01 5:38 PM
Sender: Mark Westlund
To: Nannie Turrell
Priority: Normal
Subject: Environment: Presidio comments

October 2, 2001

Ms. Nannie Turrell
Planning Department
25 Van Ness Avenue #400
San Francisco, CA 94102

Dear Ms. Turrell,

Thank you for the opportunity to give feedback on the draft Environmental Impact Statement for the Presidio Trust, and on the draft Implementation Plan.

Here are some concerns that we have identified, and have made suggestions in keeping with policy directions established by San Francisco's Commission on the Environment:

1) Community Assurances: We applaud the measures on PTIP page xii assuring sustainable design and reduction of automobile traffic in favor of promoting alternative means of transportation. However, we would like to see a clear commitment to ecological restoration.

2) Presidio Wetlands/Crissy Field Marsh: The Trust should commit to expanding the wetlands from the current 16 acres to at least 30 acres. Unless restored to optimum size, the lagoon cannot evolve into a self-sustaining tidal marsh. Otherwise, we risk squandering public and private investment already expended on the project. The scope of work for the proposed study should be made available for public and peer review.

3) Tennessee Hollow: The PTIP rightly calls for restoring the riparian habitat. However, restoration is not sufficiently defined, and some specifics are needed. For instance, adequate setbacks from each side of tributaries should be established, and a commitment made to: removing landfill, removing Morton Street ball field, and removing buildings as needed to accommodate the riparian corridor restoration.

4) New construction: The PTIP should commit to no new construction that might interfere with the habitat restoration projects and expansion at Presidio Wetlands, and to the Tennessee Hollow riparian corridor and its connection to the expanded wetlands.

5) Access (PTIP, page 96): The Trust should ask Caltrans and the SF County Transportation Authority to exercise sensitivity to the above restoration projects.

6) Planning: The Trust should expedite its wetlands siting and configuration studies ahead of the Doyle Drive reconstruction process. The road should conform the natural setting and ecological restoration projects, and not the other way around.

7) Public Health Service Hospital: The Vegetation Management Plan shows significant sensitive natural habitat in the area. The Trust should commit to preserving habitat rather than converting to conventional "landscaping."

8) Toxic Cleanup: Graded Area 9 and Landfill 8 should be cleaned up and restored as habitat. Fill material and rubble should be removed, and appropriate respect and recognition should be shown towards the cemetary underlying landfill 8.

9) Save the Quail: The Trust has been very supportive of the campaign to save the California quail. Trust should further commit to no new ball field or other construction in quail habitat, and to expand habitat at Lobos dunes and other locations, and to create corridors.

10) Baker Beach Apartments (Wherry housing): The Trust is correct that removal is best option. This ought to be coordinated with Fish & Wildlife Service's endangered species recovery plan.

11) Programming. The PTIP calls for three times as much museum space as the original General Management Plan Amendment. Museums should be limited to those needed to interpret the military, cultural and natural history of the Presidio.

12) Wastewater treatment and water conservation: The Presidio should not be increasing the burden on the Southeast community. Best management practices are needed to reduce water consumption. Recycled water should be made available, and the use of potable water for landscaping should be minimized or eliminated. Care should be taken not to apply recycled water to sensative areas where it could alter the natural groundwater chemistry, flow characteristics, or the nutrient content of native soils.

13) The Trust should commit to complying with the City's resource efficient building ordinance, and to the Integrated Pest Management ordinance. Buildings in the Presidio should be cutting edge "green" buildings (at least meeting LEED Silver rating), and efforts should be made to adopt non-chemical responses to pest management whenever possible.

14) Housing: Emphasis should be put on habitat restoration and expansion, and not on building new housing. Any new staff housing should be constructed on areas that are not environmentally sensitive. Non-historic housing should be removed. Construction overall should be kept at a minimum.

Thank you again for the opportunity to offer feedback on the presidio plan.
Sincerely yours,

Jared Blumenfeld,
Director

Mark Westlund
Public Information Officer
SF Department of the Environment
11 Grove Street
San Francisco, CA 94102
(415)355-3714, f. (415)554-6393

Mark_Westlund@ci.sf.ca.us
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THE DEPARTMENT OF THE ENVIRONMENT'S MISSION IS TO IMPROVE, ENHANCE, AND PRESERVE THE ENVIRONMENT AND PROMOTE SAN FRANCISCO'S LONG-TERM ENVIRONMENTAL SUSTAINABILITY.

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SAN FRANCISCO COUNTY TRANSPORTATION AUTHORITY
100 Van Ness Avenue, 25th Floor, San Francisco, CA 94102(415) 522-4800 Fax: (415) 522-4829 E-mail: info@sfcta.org

MEMORANDUM

DATE: October 11, 2001

TO: Nannie Turrell, Planning Department

FROM: Maria Lombardo, Deputy Director – Plans and Programs

SUBJECT: Comments on Presidio Trust Implementation Plan Draft EIS and Related Documents

---

Thank you very much for coordinating the development of a citywide letter of comments on the PTIP. As we discussed, the Transportation Authority will be submitting a letter of comments directly to the Presidio Trust in our role as Congestion Management Agency for San Francisco and as project manager for the Doyle Drive Environmental and Design Study. However, we are happy to share with you some initial comments that are most relevant to the citywide letter. These comments are included as an attachment to this letter. In addition, we will provide you with a copy of our letter to The Presidio Trust on the PTIP as soon as it is available.

Please feel free to call me with any questions. I can be reached at 522-4802.

Attachment

Cc: JLM
LS
HNS

O:\Doyle Drive Project\Presidio Trust\PTIP EIS\SFCTA comments\comments to city101101.doc

San Francisco County Transportation Authority Comments on Presidio Trust Implementation Plan Draft EIS and Related Documents

Environmental Impact Statement

- The No-Action Alternative notes that there have been several changes since the 1994 GMPA (General Management Plan Amendment) and those changes are incorporated into the GMPA No-Action Alternatives. However, since the 1994 GMPA, the Doyle Drive replacement and its direct Presidio access have not been funded (nor is this part of the Trust's funding plan). Neither the Doyle Drive replacement nor an individual interchange is included in Track 1 of the fiscally constrained version of the Draft 2001 Regional Transportation Plan (RTP). In addition, at this time there is no certainty that the results of the current Doyle Drive Design and Environmental Study will result in such an alternative. In light of this, the No Action Alternative should be changed to reflect No-Action with respect to Doyle Drive. This is of particular concern, since none of the other alternatives include "no direct access" to Doyle Drive. The implications of the lack of approval and guaranteed funding for the direct access connection to the Presidio must be covered as part of the PTIP EIS. Notwithstanding this comment on the PTIP, the Authority is working diligently to move the Doyle Drive replacement project forward.

- Under Key Differences (page 19 of the EIS), include the differences in the transportation and parking systems. If the Trust is considering the direct access from Doyle Drive, has the parking currently under Doyle Drive been considered in the supply? If so, then any alternative noting the direct access should consider the loss of that parking supply.

- Figures 3, 5, 7, 9, 11, and 13 of the EIS, which show the proposed land uses of the different alternatives, are very difficult to compare. Improve the graphical description of the alternatives and highlight the differences between the alternatives. Currently, it is very difficult to understand the differences between the alternatives.

- One of the assumptions listed on page 318 of the EIS is that most employed residents of the Presidio would also work within the Presidio. That may be realistic in a one worker household, but not in a multiple worker household. It is not likely that both or all workers in a multi-worker household would work at the same location. Some work trips (or tours) would have to leave the Presidio. Also, there is no discussion of childcare or school facilities within the Presidio, so some households would have external education trips. How many multi-worker households were assumed? What proportion of the household work trips was assumed to be internal to the Presidio?

- Why would the Travel Demand Management program (page 318) be consistent across all the alternatives? Different land uses would require different trip reduction measures. Also, the trip reducing impacts of the TDM program should be quantified and documented, since they are assumed in the traffic analysis of all the alternatives. A baseline analysis with no trip reduction should be performed.

- On page 321 of the EIS, the mode split was presented for the alternatives. Please clarify if this is a daily trip mode split or for a specific purpose. Provide the source of these splits.

- Revise the headings of Tables 45 through 47 in the EIS to show which columns represent the 2000 and 2020 levels of impact.

- There is little discussion of trip distribution in the EIS or the Background Transportation Report for the Draft EIS. At a minimum, provide a map and chart indicating the distribution of the Presidio trip, and provide the directional distribution. Are both weekday and weekend trip distributions available?

Presidio Trust Implementation Plan

- Through the Doyle Drive Design and Environmental Study, the Authority has been coordinating with the Trust, the National Park Service (NPS), Golden Gate Bridge and Highway Transportation District (GGBHTD), and Muni regarding transit services relative to the Presidio and Doyle Drive. It was the understanding of the Authority, based on these meetings, that a transit hub and related planning for that hub was unacceptable. However, on page 48 of the PTIP a transit hub is shown, and its role in future planning is discussed on page 49. This seems incongruous to the direction SFCTA was given for future transit planning at the Presidio. The hub is not mentioned in the EIS. Please clarify this apparent discrepancy.

Background Transportation Report

- Page 14 of the Background Transportation Report contains a discussion of pedestrian and bicycle facilities. However, this section should discuss the impacts of increased vehicular volume on the cyclists' and pedestrians' ability to cross busy streets. What is the impact of the extensive number of pedestrians and bicyclists on the local roadway network? Also, with increased vehicular traffic, should the bicycle and pedestrian facilities be improved to enhance safety?

- The existing conditions discussion only analyzes traffic for weekday AM and PM peak hour conditions. The report contains a seasonal variation discussion by weekday, but weekend conditions are not evaluated. Since weekend concerns warrant mention in Section 2.3.2 (of the Background Transportation Report), a weekend condition analysis should be included in the intersection capacity analyses. The need for weekend analysis is further reinforced by the references on page 3-12 through 3-13 to increased activity of recreational trips on weekends. Finally, Table 3-7 shows that most alternatives have more daily weekend person trips than they have weekday person trips. In most cases, this activity level is 50 to 90 percent above the weekday activity level. Given this evidence, why wasn't a more rigorous analysis performed for weekend conditions?

- Section 2.4.2 (of the Background Transportation Report) notes that no ridership data was available for the Richardson Avenue/Francisco Street bus stop for Golden Gate Transit routes but "previous observations indicate that few passengers were originating or terminating their trips in the Presidio." Does this consider the Toll Plaza bus stop (located in the study area)? During the past few years, several hundred new employees have begun to work on the Presidio. When were these observations done? Where are

they documented? Has the Presidio employment total changed since this survey was taken?

- Analyses of intersections with Girard Road are missing from future conditions analysis in any report. Girard Road would provide direct access to Doyle Drive in the Presidio; therefore, at a minimum the intersections along Girard should be analyzed for both no-direct access and direct access alternatives. This important future gateway road should be analyzed in all alternatives.

O:\Doyle Drive Project\Presidio Trust\PTIP EIS\SFCTA comments\comments to city101101.doc

City and County of San Francisco

Board of Supervisors

Presidio Neighborhood Representative Work Group
Joan Girardot, Chair

October 21, 2001

Supervisor Leland Yee PhD, Chair
Neighborhood Services & Parks Committee
City Hall Room 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102-4689

Re: File No. 011293
Presidio Neighborhood Representative Work Group
Presidio Trust Implementation Plan/DEIS Commentary

Dear Supervisor Yee,

At the October 12th meeting of the Work Group, the Planning Dept. announced it would take comments on the PTIP/DEIS until October 22nd. Thus the Final Draft Letter will not be available until October 23rd, with the Final Letter due to be submitted to the Presidio Trust on October 25th.

Additional comments submitted to the Planning Dept. by Work Group members at our October 12th and 19th meetings, including a Sierra Club Resolution relating to the Presidio Transportation Demand Management Program, will be included by the Planning Dept. in the City commentary and require no action by the Board of Supervisors.

This letter transmits five Resolutions passed by the Work Group which do require consideration by the Board of Supervisors. These Resolutions are attached.

The Planning Dept. letter providing the City's commentary on the PTIP/DEIS was developed with substantive input from the members representing affected neighborhoods, and has the full support of the neighborhoods. This remarkable consensus was achieved through the cooperative effort between the City and its citizens made possible by the legislation establishing the Work Group, and the Work Group wishes to continue to assist the City in working to develop consensus on future planning projects at the Presidio.

The members wish to thank you for your leadership on Presidio issues.

Sincerely,

Joan Girardot

Joan Girardot, Chair

1 Dr. Carlton B. Goodlett Place, Suite 448, San Francisco, CA 94102
Martha Yanez, Secretary (415) 554-6134 VOICE (415) 558-7844 FAX

Resolution urging the Board of Supervisors to urge the Presidio Trust to adopt voluntarily a policy of open public meetings in accordance with the State of California Brown Act, and to hold all its meetings in San Francisco. (Resolution Adopted 9/21/01)

Discussion

The Presidio Trust Act (Section 103(c)(6) provides: "The Board shall meet at least three times per year in San Francisco and at least two of those meetings shall be open to the public. Upon a majority vote, the Board may close any other meetings to the public."

The Work Group believes the public interest is not well-served by allowing the seven unelected, unaccountable, politically-appointed private citizens who comprise the Trust Board to do virtually all their business behind closed doors, with only two meetings per year open to the public.

1 Dr. Carlton B. Goodlett Place, Suite 448, San Francisco, CA 94102
Martha Yanez, Secretary (415) 554-6134 VOICE (415) 558-7844 FAX

City and County of San Francisco

Board of Supervisors

Presidio Neighborhood Representative Work Group
Joan Girardot, Chair

Resolution urging the Presidio Trust to evaluate a 7th Alternative, the "No New Construction Alternative", defined as "no construction of new buildings and no expansion of existing buildings - either vertically, horizontally, or underground."
(Resolution Adopted 10/12/01).

Discussion

The Work Group believes the six Alternatives evaluated in the PTIP permit too much development and intensity of use at the Presidio and adoption of any one of them would result in compromising the natural, scenic, recreational and open space values of the Park and the vision of the 1994 GMPA. Under NEPA Regulations, the sponsoring federal agency must evaluate all "reasonable" alternatives in its Environmental Impact Statement, with "reasonable" generally defined as "technically and financially feasible" and satisfying common sense.

The common organizing principle behind the six Alternatives is the degree to which each achieves the Trust mandate to be financially self-sufficient (defined as non-reliance on federal appropriations) by 2013. Since all six Alternatives would fulfill the Trust mandate, (as confirmed by the Trust and supported by the GAO Audit of 10/4/01), it is "reasonable" to ask that an Alternative for a management plan of lesser intensity be evaluated to ascertain whether it also could meet the financial self-sufficiency mandate. The Planning Dept. agrees with this and voted to include in its commentary a request for evaluation of this Alternative.

The "No New Construction Alternative" speaks only to the issue of square footage and recognizes that prevention of new construction also prevents the inappropriate development envisioned in the PTIP, such as the proposed development of the Southern edge of Crissy Field. Implicit in the "No New Construction Alternative" is the mandate that when planned demolition of non-historic buildings occurs, no replacement construction could take place. The freed-up square footage would revert to parkland. This Alternative would also obviate the banking of square footage from demolitions in one area of the Park to use for new construction in another area of the Park. This Alternative also opens up for re-evaluation the new construction at the Letterman site. (Note: The Coalition for San Francisco Neighborhoods at its 10/16/01 meeting endorsed the "No New Construction Alternative.") The Board of Supervisors might consider sending a letter to the Presidio Trust urging evaluation of this Alternative in the final EIS.

1 Dr. Carlton B. Goodlett Place, Suite 448, San Francisco, CA 94102
Martha Yanez, Secretary (415) 554-6134 VOICE (415) 558-7844 FAX

Resolution urging the Board of Supervisors to request the City Attorney to write a letter to the Presidio Trust notifying them not to take any action with respect to signing a lease agreement with Lucas Digital Arts for the Letterman site until the Record of Decision on the PTIP occurs. (Resolution Adopted 10/19/01).

Discussion

Under NEPA Regulations (40CFR Section 1502.2(f)), "Agencies shall not commit resources prejudicing selection of alternatives before making a final decision."

Significant new information received subsequent to the Final EIS for the Letterman site (which is wholly within Area B of the Presidio) calls into question the justification for this commercial office development in the Presidio National Park. That justification was the monetary contribution of the Lucas development to the financial self-sufficiency of the Trust by 2013. Subsequent information concerning the robust health of Trust finances (confirmed by the GAO Audit of 10/4/01 and independent analysis) and the likelihood that the Trust in the future will generate revenues in excess of those needed to operate the Presidio including funds for restoration, preservation, and adequate capital reserves, call into question the "need" for the Lucas development.

Based on the new information concerning Trust finances and questioning the need for new development in the Park, the City response to the PTIP calls for evaluation in the Final EIS of a "No New Construction Alternative" and also evaluation of the 1994 GMPA Alternative. Either of these, if adopted, would prevent the full Lucas development. If the planned 65 year ground lease agreement with Lucas were to be signed by the Trust prior to the Record of Decision on the PTIP, this would irretrievably commit federal resources (the Letterman site) to private hands, thereby prejudicing the selection of alternatives by negating the possibility of the selection of the No New Construction or the 1994 GMPA Alternatives.

1 Dr. Carlton B. Goodlett Place, Suite 448, San Francisco, CA 94102
Martha Yanez, Secretary (415) 554-6134 VOICE (415) 558-7844 FAX

City and County of San Francisco

Board of Supervisors

Resolution urging the Board of Supervisors to send a letter to the Presidio Trust requesting that in the Final EIS, the Trust adopt a preferred Alternative that includes the following characteristics:

a) No more than the 5.1 million square feet of building space allowed in the 1994 GMPA;

b) No new construction (defined as "no construction of new buildings and no expansion of existing buildings - vertically, horizontally, or underground");

c) The phased demolition called for in the 1994 GMPA;

d) Provision of housing units through subdivision of large homes and conversion of other buildings;

e) Limitation of building space allocated to cultural and educational uses to the amount proposed in the 1994 GMPA;

f) Limitation of building space allocated to retail tenants to those which support Park programs and services as envisioned in the 1994 GMPA.

(Resolution Adopted 10/19/01).

Note: Above language to be verified by Martha Yanez, Secretary to the Work Group and by Nannie Turrell, Planning Department.

1 Dr. Carlton B. Goodlett Place, Suite 448, San Francisco, CA 94102

Resolution urging the Board of Supervisor to adopt the following resollution concerning the Presidio Trust Draft Plan Alternative and Draft Environmental Impact Statement:

Whereas:

** The Presidio Trust Draft Plan Alternative calls for 5.6 million square feet of development in the Presidio,including 710,000 square feet of new construction (in addition to 900,000 square feet of new above-ground construction and 589,000 square feet of new underground construction for the Lucas project);

** The Draft Plan would, according to the Draft Environmental Impact Statement (DEIS), draw 9.2 million visitors to the Presidio Area B managed by the Trust each year, result in "feelings of overcrowding" and create unacceptable levels of traffic at 14 intersections within and outside the Presidio;

** The Draft Plan would also create unacceptable levels of traffic at the Marina Blvd/Mason Street/Lyon Street intersection and at the Gorgas Avenue/Lyon Street/Richardson Avenue intersection;

** The amount of development proposed in the Draft Plan is not needed to make the Presidio financially self-sustaining, as is shown in the GMPA 2000 Alternative in the DEIS;

** The excessive development proposed in the Draft Plan would cause a financial and logistical strain on city services, have a negative impact on surrounding city neighborhoods, and jeopardize the goal of protecting the park's natural, recreational and historical resources;

** The Draft Plan proposal to have the Trust play the primary role in program delivery and development and to have the Trust spend $10 million per year on programs (as indicated in the DEIS) and spend potentially $22.7 million per year (as indicated in the Draft Plan document) could result in the undertaking of inappropriate real estate development simply to fund these efforts;

** The Draft Plan gives almost unlimited discretion to future Trust board members and staff to decide on Presidio land uses, while at the same time failing to specify future planning processes and guarantee public input into those processes;

City and County of San Francisco Board of Supervisors

Presidio Neighborhood Representative Work Group
Joan Girardot, Chair

THEREFORE BE IT RESOLVED that the San Francisco Board of Supervisors urges the Presidio Trust to:

** Assert a continuing commitment to implementing the vision and objectives articulated in the General Management Plan Amendment (GMPA) of 1994, including protecting the park's natural, recreational and historical resources and playing a positive role for the future regarding the challenges of global cooperation and sustainability;

** In implementing its plan, reduce the total square footage of development to an amount in harmony with the vision of the 1994 GMPA;

** Focus on the re-use of existing buildings for uses that befit a national park;

** Give priority in leasing to fiscally responsible tenants that support park programs and services related to the vision and objectives of the 1994 GMPA and that are fully committed to the widest possible public access to the park's resources;

** Provide housing units through reconfiguration and subdivision of existing buildings; provide no more housing units than currently exist on the Presidio; and within that number, maintain the existing proportions between housing units and single room occupancy or dormitory quarters. Hospital beds shall not be counted as "housing units;"

** Provide a balance of tenant and Trust-sponsored programs appropriate in content and size for the Presidio; allow for public input in the planning of programming; and ensure that inappropriate development does not occur simply to provide a lease income to fund unneeded programming efforts;

** (Transportation management: insert statement provided by Peter Straus of MUNI and included in resolution by Work Group 10/19/01)

** Guarantee future specific planning processes for each planning district in the Presidio and for Presidio-wide topics such as programming, and guarantee public participation in these planning processes.

AND BE IT ALSO RESOLVED: That the Board of Supervisors continue to maintain the Presidio Neighborhood Representative Work Group to assist the City in working constructively with the Presidio Trust on future planning efforts for the Presidio.
(Resolution Adopted 10/19/01).
Note: Final text of this Resolution to be verified byMarth Yanez, Secretary to the Work Group and by John Cooper, Deputy City Attorney.

1 Dr. Carlton B. Goodlett Place, Suite 448, San Francisco, CA 94102
Martha Yanez, Secretary (415) 554-6134 VOICE (415) 558-7844 FAX

FILE NO. 011908 RESOLUTION NO. 785-01

[Presidio Trust Draft Implementation Plan – Environmental Review of Impacts on Neighborhoods and City]

Resolution urging Presidio Trust to allow development or renovation only as befits a national park, to guarantee public participation in future planning processes.

WHEREAS, The Presidio Trust Draft Implementation Plan Alternative ("Draft Plan") calls for 5.6 million square feet of development in the Presidio, including 710,000 square feet of new construction (in addition to 900,000 square feet of new above-ground construction and 589,000 square feet for an underground garage for the Lucas project); and

WHEREAS, The Draft Plan would, according to the Draft Environmental Impact Statement (EIS), draw 9.2 million visitors to the Presidio Area B managed by the Trust each year, result in "feelings of overcrowding," and create unacceptable levels of traffic at 14 intersections within and outside the Presidio; and

WHEREAS, the Draft Plan also cause unacceptable levels of traffic at the intersections of Marina/Mason/Doyle Drive and Lyon/Francisco/Gorgas; and

WHEREAS, The amount of development proposed in the Draft Plan is not needed to make the Presidio financially self-sustaining, as is shown in the GMPA 2000 alternative in the EIS; and

WHEREAS, the Board of Supervisors established the Presidio Trust Neighborhood Representative Work Group ("Work Group"), consisting of as a broad-based coalition of neighborhood organizations to work with the Planning Department in compiling comments on the Draft Plan and its associated EIS; and

WHEREAS, the Work Group and the Planning Department have agreed to submit a number of EIS comments to the Presidio Trust which, among other things, request

consideration of additional alternatives, and establish characteristics which should be included in any final Implementation plan; and

WHEREAS, the Planning Department comments establish that the Draft Plan and the EIS should be substantially revised and submitted for additional public comment before adoption by the Trust; now, therefore, be it

RESOLVED, That the Board of Supervisors urges the Presidio Trust to assert a continuing commitment to implementing the vision and objectives articulated in the General Management Plan Amendment of 1994, including protecting the park's natural, recreational and historical resources and playing a positive role for the future regarding the challenges of global cooperation and sustainability; and, be it

FURTHER RESOLVED, That the Presidio Trust should focus on the re-use of existing buildings for uses that befit a national park; and, be it

FURTHER RESOLVED, That the Presidio Trust give priority in leasing to fiscally responsible tenants that serve a public purpose and that will support park programs and services as envisioned in the 1994 GMPA; and, be it

FURTHER RESOLVED, That the Presidio Trust guarantee future specific planning processes for each planning district in the Presidio and for Presidio-wide topics such as programming, and guarantee public participation in these planning processes; and, be it

FURTHER RESOLVED, That the Presidio Trust develop an integrated program of transit and transportation improvements, which include addressing the future of Doyle Drive, and which shall be capable of achieving the balanced transportation goals of the Transportation Demand Management program and mitigating the transportation impacts of the land use plan; and, be it

FURTHER RESOLVED, That the Board of Supervisors urges the Presidio Trust to adopt the EIS comments and recommendations of the Planning Department as supported by the Working Group in an effort to retain the Presidio's character as an outstanding national resource.

Leland Y. Yee, Ph.D.
BOARD OF SUPERVISORS

City and County of San Francisco
Tails
Resolution

City Hall
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102-4689

File Number: 011908 **Date Passed:**

Resolution urging Presidio Trust to allow development or renovation only as befits a national park, to guarantee public participation in future planning processes.

October 22, 2001 Board of Supervisors — ADOPTED
Ayes: 8 - Ammiano, Daly, Hall, Maxwell, Newsom, Peskin, Sandoval, Yee
Absent: 3 - Gonzalez, Leno, McGoldrick

File No. 011908

I hereby certify that the foregoing Resolution was ADOPTED on October 22, 2001 by the Board of Supervisors of the City and County of San Francisco.

Virginia Hobson
for Gloria L. Young
Clerk of the Board

OCT 24 2001
Date Approved

Mayor Willie L. Brown Jr.

SAN FRANCISCO COUNTY TRANSPORTATION AUTHORITY
100 Van Ness Avenue, 25th Floor, San Francisco, CA 94102 (415) 522-4800 Fax: (415) 522-4829
E-Mail: info@sfcta.org Website: www.sfcta.org

October 24, 2001

PTIP
c/o John Pelka
NEPA Compliance Manager
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Subject: Presidio Trust Implementation Plan

Dear Mr. Pelka:

Thank you for the opportunity to provide comments on the Presidio Trust Draft Implementation Plan (PTIP) and associated documents, and for extending the public comment period to October 25, 2001. The Authority is providing comments in its capacity as Congestion Management Agency for the City and County of San Francisco and as the project manager for the Doyle Drive Environmental and Design Study. Our comments focus on transportation, but also cover other areas such as natural and historic resources where they relate to work being done as part of the Doyle Drive EIR/EIS.

Our most significant comments, including overall comments on the PTIP and associated documents are as follows:

Doyle Drive Replacement Project/Direct Access to the Presidio

- The No-Action Alternative notes that there have been several changes since the 1994 General Management Plan Amendment (GMPA) and that those changes have been incorporated into the GMPA No-Action Alternative. One of the changes that was assumed is a reconfigured Doyle Drive with direct access to the Presidio. While significant progress is being made on the Doyle Drive EIR/EIS, the replacement project is not yet fully funded nor is it contained in the fiscally constrained portion (Track 1) of the Metropolitan Transportation Commission's Draft 2001 Regional Transportation Plan (RTP). Given this and the fact that direct access from Doyle Drive to the Presidio is not included in the Presidio Trust's funding plan either, it seems inappropriate to include this project in the No Action Alternative. This is of particular concern, since none of the other alternatives include no direct access (the current condition) to Doyle Drive.

  The implications of the lack of approval and guaranteed funding for the direct access connection from Doyle Drive to the Presidio must be covered as part of the PTIP EIS.

Just a few of the issues that would need to be addressed include:

- What are the impacts on the local streets that would serve as the only access route to the Presidio?
- What are the implications for Golden Gate Transit service to the Presidio if the most direct access that Golden Gate Transit would provide to the Presidio is at the Golden Gate Bridge toll plaza? A new route must detour from Doyle Drive to a destination within the Presidio would necessarily increase operating costs and travel time for passengers. How would these increased costs be covered?
- What are the implications for tour bus access routes to the Presidio and associated impacts on neighborhood streets?
- What are the implications for bicycle and pedestrian travel given the additional traffic on local streets near Presidio entrances?

- The discussion of Key Differences between the alternatives (page 19 of the PTIP EIS) should include the differences in the transportation and parking systems, and reflect the change to the No Action Alternative to include no direct access from Doyle Drive to the Presidio. For the alternatives that do assume direct access from Doyle Drive, has the loss of parking currently under Doyle Drive been incorporated into the parking supply analysis?

- Analyses of intersections with Girard Road are missing from future conditions analyses in the PTIP and associated reports. Girard Road would provide direct access to Doyle Drive in the Presidio; therefore, at a minimum the intersections along Girard should be analyzed for both no-direct access and direct access alternatives. Transportation system performance for this important future gateway road should be analyzed in all alternatives.

- Through the Doyle Drive Design and Environmental Study, the Authority has been coordinating with the Presidio Trust, the National Park Service (NPS), Golden Gate Bridge and Highway Transportation District (GGBHTD), and Muni regarding transit services relative to the Presidio and Doyle Drive. It was the understanding of the Authority, based on these meetings, that a transit hub and related planning for that hub was unacceptable. However, on page 48 of the PTIP a transit hub is shown, and its role in future planning is discussed on page 49. This seems incongruous to the direction the Authority was given for future transit planning at the Presidio. The hub is not mentioned in the EIS. Please clarify this apparent discrepancy.

Travel Demand Management Program and Parking Supply

- Why would the Travel Demand Management (TDM) program (page 318 of the EIS) be consistent across all the alternatives? Different land uses may very well require different trip reduction measures. Also, the trip reducing impacts of the TDM program should be quantified and documented, since they are assumed in the traffic analysis of all the alternatives. A baseline analysis with no trip reduction should be performed so that the effects of the TDM program(s) can be evaluated.

- Table 49 on page 331 of the PTIP EIS shows parking demand and supply by alternative. For all the alternatives, the supply is higher than the demand, and for most of the alternatives the surplus is over one thousand spaces. On page 395, the report states that the "...surplus of parking spaces could potentially compromise the efforts of the TDM program to reduce single-occupant vehicles and encourage non-auto modes." Management of parking supply is one of the most effective means of managing vehicular traffic. Given this, why weren't more parking spaces transformed to other uses? Also, please clarify how parking demand was determined.

- The transportation mitigation section (pages 338 to 344 of the EIS) includes many different measures. However, TR18 is the implementation of the Presidio-wide parking management program and TR19 is the implementation of the TDM program. How can these be considered mitigations of impacts if they are assumed to be in place throughout the analysis? What additional impacts would they mitigate?

Transportation Analyses

- Overall, more detail is needed to better illustrate the likely transportation impacts of the PTIP alternatives on transportation system performance. If the impacts are unclear, it is difficult to identify appropriate mitigations that will minimize adverse impacts on auto, transit, bicycle, and pedestrian travel in San Francisco. Furthermore, it makes it difficult to evaluate other related impacts such as noise levels. Once mitigations are identified, cost estimates and funding plans need to be identified. There is little discussion of trip distribution in the EIS or the Background Transportation Report for the Draft EIS. At a minimum, provide a map and chart indicating the distribution of the Presidio trip, and provide the directional distribution. Are both weekday and weekend trip distributions available?

- The existing conditions discussion in the Background Report only analyzes traffic for weekday AM and PM peak hour conditions. The report contains a seasonal variation discussion by weekday, but weekend conditions are not evaluated. Since weekend concerns warrant mention in Section 2.3.2, a weekend condition analysis should be included in the intersection capacity analyses. Furthermore, the need for weekend analysis is reinforced by the references on page 3-12 through 3-13 to increased activity of recreational trips on weekends. Finally, Table 3-7 shows that most alternatives have more daily weekend person trips than they have weekday person trips. In most cases, this activity level is 50 to 90 percent above the weekday activity level. Given this evidence, a more rigorous analysis should be performed for weekend conditions.

Clearly, the replacement of Doyle Drive, including provision of direct access to the Presidio, is of critical importance to the success of the Presidio Trust's Implementation Plan in terms of providing direct access while minimizing the impacts of traffic on nearby local streets and neighborhoods. Furthermore, many of the alternatives under consideration would result in a roadway facility that is much more compatible with the park setting. We know that the Presidio Trust recognizes the importance of this project and we look forward to continuing to work with the Presidio Trust and our other partners on the Doyle Drive replacement project.

Additional detailed comments on the PTIP EIS and the PTIP Background Transportation Report are attached to this letter. If you have any questions on these comments, please do not hesitate to contact me at 415.522.4802.

Sincerely,

Maria Lombardo
Deputy Director – Plans & Programs

Attachment

cc: José Luis Moscovich
Lee Saage
Nancy Schneider
Nannie Turrell, Planning Department

Attachment

DRAFT ENVIRONMENTAL IMPACT STATEMENT – PTIP

Comment Number	Page Reference	Comment
1	Page 17	The expansion of Crissy Marsh is not mentioned under "Restoration/Remediation." Thus, it appears that Crissy Marsh restoration is not anticipated under any alternative and, therefore, is not part of the current Plan. Is this accurate?
2	Pages 25, 33, 43, 49, 57, and 63	Figures 3, 5, 7, 9, 11, and 13, which show the proposed land uses of the different alternatives, are very difficult to compare. It would be very helpful if the graphical descriptions of the alternatives were improved to highlight the differences between the alternatives. ,
3	Page 79	The historic building studies should include an updated Cold War inventory. As the Trust is aware, such an update has been conducted as part of the technical work for the Doyle Drive Environmental and Design Study. The Authority would be happy to make the results available for inclusion in the PTIP EIS.
4	Page 85	There should be some delineation of responsibilities under the Native American Graves and Repatriation Act of 1990 (NAGPRA) as part of the Applicable Regulations discussion part of this section. Please add this to the text.
5	Page 121	It is unclear whether a species list from U.S. Fish and Wildlife was obtained and used as the basis for the special status wildlife species table. On similar projects, such lists have included additional species such as the tree lupine moth and Opler's longhorn moth. The former species is known to occur at the Presidio. Please clarify the source of the special status species list and the status of the tree lupine moth.
6	Page 123	There are inconsistencies in terms of the text descriptions and species included on the table. Species such as the salt marsh yellowthroat and yellow warbler are mentioned in the text, but not are included in Table 6.
7	Page 128	The discussion of drainage does not mention the many other watersheds that drain to the Bay. Tennessee Hollow and Fort Scott are the two largest watersheds, but under the existing drainage regime, numerous other sub watersheds are present and should be noted.
8	Page 130	The EIS states that groundwater occurs in the Colma formation, dunes, and Franciscan. The EIS should note that groundwater also occurs in Bay Mud and artificial fill.
9	Page 130	The discussion of available groundwater resources data is not sufficient. A map showing locations of wells and borings would indicate to the reader what areas have been investigated.
10	Page 130	Beneficial uses for Crissy Field should be listed in the Basin Plan.
11	Page 133	In consultation with the Presidio Trust and National Park Service (NPS), additional important viewsheds/corridors were identified and are being evaluated as part of the Doyle Drive Design and Environmental Study. Several of the view corridors are appropriate for inclusion in the PTIP EIS such as the view from Crissy Field looking north toward Stillwell Hall, Hillock Street toward Crissy Field, and from Doyle Drive looking toward the Palace of Fine Arts. Please consider these additions to the analysis.
12	Pages 139 - 143	Existing residences on Armistead Road and Storey Avenue are not identified as sensitive noise receptors. These sensitive receptors should be added. Crissy Field Marsh, Lobos Creek and Fort Scott Parade Ground are identified in the text as sensitive receptors but are not indicated as such in Figure 25. Please make the text and table consistent.

Comment Number	Page Reference	Comment
13	Pages 221 - 229	The impacts should note that there would be the introduction of new elements into an historic district and further note that these elements would have an adverse impact on the historic district.
14	Page 261	Are there any other "unique geologic features" besides those that are stated in the PTIP (e.g., the Colma dunes and the bluffs south of Crissy Field and at Inspiration Point)? The current system appears subjective and may not provide for consistent protection of unique geologic resources. The EIS should develop criteria for designating a geologic feature as "unique" and present a complete inventory. If planners do not know what the unique geologic features are, they are less likely to be avoided or considered in preliminary plans.
15	Page 261	Please include the type of groundwater monitoring that would be most useful in the effort to protect "subsurface hydrologic resources and functions." Please list where the locations of this monitoring would occur.
16	Page 271	Based on a review of the potential visual changes due to the implementation of any of the alternatives, it would be more appropriate to say, "would MINIMIZE visual resource impacts" as opposed to the current text which reads, "would reduce visual resource impacts to a level of insignificance."
17	Page 265	Mitigation Measure NR-13 requires compliance with existing regulations and programs. No additional mitigation is specified. The discussion of compliance with existing programs should be included in the impact discussion and not labeled as EIS mitigation.
18	Page 265	Mitigation Measure NR-14 indicates that "visitor numbers and uses would be monitored on a recurring basis, and measures would be taken to reduce impacts as necessary." More detail is required regarding who would be responsible for the monitoring, how frequently it would occur, who would determine if there is an impact and what mitigation measures would be required? Do "regulatory measures" refer to restricting access of visitors to substantial portions of the Presidio?
19	Page 265-6	Mitigation Measure NR-15 also calls for monitoring of run-off into Crissy Marsh. The EIS should indicate who would conduct the monitoring, for what constituents, and at what frequency. The EIS should also indicate how the data would be analyzed, as well as guiding mitigation.
20	Page 285	Although the second full paragraph acknowledges that pile driving could be used for construction, there is no analysis of the potential noise impacts from pile driving, which would result in noise levels exceeding those currently predicted in the analysis. These impacts need to be analyzed and mitigation for the noise should be included.
21	Page 287	The methodology discussion on page 281 states that traffic noise impacts are assessed using the Noise Abatement Criteria (NAC) of the Federal Highway Administration (FHWA); however, the second paragraph on page 283 introduces the concept of noticeable increase in noise as defined as 3 dBA. It is unclear whether both of these criteria are being applied in the impact analysis. Please provide clarification.
22	Page 287	The analysis states that traffic noise levels at the San Francisco National Cemetery and the World War II Memorial approach or exceed the NAC. However, there are no quantitative values of predicted traffic sound levels for the San Francisco National Cemetery and the World War II Memorial presented in the document. This is also true for the receptor identified as Riley Avenue housing under other alternatives. The predictive values should be included in the EIS.

Comment Number	Page Reference	Comment
23	Page 318	One of the assumptions listed is that most employed residents of the Presidio would also work within the Presidio. That may be realistic in a one worker household, but not in a multiple worker household. It is not likely that both or all workers in a multi-worker household would work at the same location. Some work trips would likely leave the Presidio. Also, there is no discussion of childcare or school facilities within the Presidio, so some households would have external education trips. How many multi-worker households were assumed? What proportion of the household work trips was assumed to be internal to the Presidio?
24	Page 321	The mode split was presented for the alternatives on this page. Please clarify if this is a daily trip mode split or for a specific purpose (e.g. commute). Provide the source of these splits.
25	Pages 324-326	Revise the headings of Tables 45 through 47 to show which columns represent the 2000 and 2020 levels of impact.

COMMENTS ON PRESIDIO TRUST IMPLEMENTATION PLAN BACKGPOUND TRANSPORTATION REPORT FOR THE DRAFT EIS

Comment Number	Chapter Reference	Comment
A-1	Chapter 1: Introduction	The report does not evaluate the impact of the alternatives on the National Highway System links. What effect does the PTIP have on those facilities?
A-2	Chapter 2: Existing Conditions	No facility types or lane capacities are discussed for key roadways listed in the report. These need to be included. Are intersection operations the sole determinant of street capacity for the PTIP EIS? Please clarify.
A-3	Chapter 2: Existing Conditions	The intersections #3 Francisco/Richardson and #4 Gorgas/Lyon/Francisco; #6 Doyle/Marina/Lyon and #7 Mason/Marina/Lyon; and #30 Park Presidio/California and #31 14th/California are in very close proximity to each other. The discussion in Section 2.3.4 does not quantify whether or not spillback from one intersection affects the other. The text notes this issue qualitatively, but does not quantify when one intersection queue affects a nearby intersection. Please quantify the spillback effects or provide a quantifiable justification for the lack of spillback effects.
A-4	Chapter 2: Existing Conditions	Data sources vary significantly by year. In particular, pass-through traffic percentages from July 1996 were presented in Section 2.3.3. Is this percentage still valid, given the new employment at the Presidio and new traffic counts? Was the 1996 pass-through data used in other analyses? If it was used, how was it used, and does this make the traffic assumptions lower or higher? If it was used, why was the percentage of pass-through traffic presented with the 1996 data, rather than the actual number of pass-through vehicles?
A-5	Chapter 2: Existing Conditions	Section 2.4.2 notes that no surveys were done for the Richardson Avenue/Francisco Street bus stop for Golden Gate Transit routes but the "previous observations indicate that few passengers were originating or terminating their trips in the Presidio." During the past few years, several hundred new employees have begun to work on the Presidio. When were these observations taken? Has the Presidio employment total changed since this survey was taken?

<table>
<tr><th>Comment Number</th><th>Chapter Reference</th><th>Comment</th></tr>
<tr><td>A-6</td><td>Chapter 2: Existing Conditions</td><td>The analysis of existing conditions in Table 2-1 indicates that the seasonal variation at the Presidio gateways varies. The same seasonal variation discussion notes that all December traffic counts have also been increased by 15 percent (page 2-9). However, in comparing the intersection data results (Appendix A) with gateways (Table 2-2), the intersection volumes remain significantly lower at key gateways, especially at Lombard Street. A table illustrating these differences is shown below.
<table>
<tr><th>Gate</th><th>Table 2-2 Gateway Analysis</th><th>Appendix A Intersection Analysis</th><th>Appendix A Intersection Count Data</th></tr>
<tr><td>Mason St.</td><td>456</td><td>444</td><td>386</td></tr>
<tr><td>Gorgas Ave.</td><td>196</td><td>213</td><td>185</td></tr>
<tr><td>Lombard St.</td><td>1260</td><td>943</td><td>820</td></tr>
<tr><td>Presidio Ave.</td><td>1002</td><td>1065</td><td>926</td></tr>
<tr><td>Arguello Blvd.</td><td>815</td><td>927</td><td>806</td></tr>
<tr><td>Lincoln Blvd./25th Ave.</td><td>1072</td><td>866</td><td>753</td></tr>
<tr><td>Total – Comparison of gate to intersection data</td><td>4801</td><td>4458</td><td>3877</td></tr>
</table>
The actual count data seems to be at only 80 percent of the gateway analysis data, suggesting that 15 percent growth is not sufficient. Why are traffic volumes used in the intersection analysis lower than those described in the report? Locations with lower traffic volumes should have a greater growth factor applied. Please clarify.</td></tr>
<tr><td>A-7</td><td>Chapter 2: Existing Conditions</td><td>In the transit service description, it is noted that the only Golden Gate Transit Presidio access is from Richardson Avenue and Francisco Street. The Toll Plaza bus stop (located in the study area) should be included in this discussion as well.</td></tr>
<tr><td>A-8</td><td>Chapter 2: Existing Conditions</td><td>Section 2.4.2 notes that no ridership data was available for the Richardson Avenue/Francisco Street bus stop for Golden Gate Transit routes but that "previous observations indicate that few passengers were originating or terminating their trips in the Presidio." Does this consider the Toll Plaza bus stop (located in the study area)? During the past few years, several hundred new employees have begun to work on the Presidio. When were the previous observations done? Where are they documented? Has the Presidio employment total changed since this survey was taken? If so, how has this changed previous observations?</td></tr>
<tr><td>A-9</td><td>Chapter 2: Existing Conditions</td><td>Page 2-18 contains a discussion of pedestrian and bicycle facilities. However, this section should discuss the impacts of increased vehicular volume on the cyclists' and pedestrians' ability to cross busy streets. What is the impact of the extensive number of pedestrians and bicyclists on the local roadway network? Also, with increased vehicular traffic, should the bicycle and pedestrian facilities be improved to enhance safety?</td></tr>
<tr><td>A-10</td><td>Chapter 3: Travel Demand</td><td>In discussing future travel demand forecasts (pages 3-1 to 3-2), trip distribution is referenced as coming from the San Francisco Planning Department or the Authority's model. Which source was used? Was some distribution data from one source and some from another? If so, do these sources conflict?</td></tr>
<tr><td>A-11</td><td>Chapter 3:</td><td>In discussing trip distribution on Page 3-4, it says that 8 to 15 percent of</td></tr>
</table>

<table>
<tr><th>Comment Number</th><th>Chapter Reference</th><th>Comment</th></tr>
<tr><td></td><td>Travel Demand</td><td>the trips would be "internal" trips. The section suggests that different mode shares are likely for these trips, but the differences between internal and external trips are not explained in the report or the appendices. This discussion should be added to the text, along with tables showing the relevant data.</td></tr>
<tr><td>A-12</td><td>Chapter 3: Travel Demand</td><td>Page 3-4 suggests that extensive TDM measures are included with all project alternatives. What is the impact of these measures? Are there examples of how these measures have been applied successfully in other areas? How much mode change and trip reduction are expected to occur as a result of these measures?</td></tr>
<tr><td>A-13</td><td>Chapter 3: Travel Demand</td><td>Page 3-5 indicates that a parking regulation and fee program would be implemented. On page 3-5, the report references that the TDM program includes a series of parking management measures. The proposed TDM program in Appendix D of the PTIP does not contain these measures. The item is instead discussed in Principle 21 of Parking Management. Parking charges can also lead to neighborhood parking intrusion for those areas outside of the Presidio. What is the impact of a parking regulation and fee program on nearby areas? Was the impact of this program assumed in the travel demand model? What steps could be taken to minimize spillover-parking impacts on nearby areas?</td></tr>
<tr><td>A-14</td><td>Chapter 3: Travel Demand</td><td>What is the source of the mode share assumptions itemized on page 3-5?</td></tr>
<tr><td>A-15</td><td>Chapter 3: Travel Demand</td><td>The report references Table A-1 through A-28. In comparing these tables, there appears to be a significantly higher portion of trips coming from bicycles/pedestrians and others than are created in the percent external trip data. Similar inconsistencies are noted with most land use types in most study districts. There appears to be much less internal trip making for many areas or land use categories, when compared to the percentage of persons that walk or bicycle. Please clarify why bicycle and pedestrian trip assumptions are so much higher than the internal trip assumptions.</td></tr>
<tr><td>A-16</td><td>Chapter 3: Travel Demand</td><td>On page 3-11, the report details that the trip distribution comes from sources identified on pages 3-1 to 3-2. It also notes that data comes from a survey of Presidio employees. Why are the trip distribution sources inconsistent? How do these sources relate to each other?</td></tr>
<tr><td>A-17</td><td>Chapter 3: Travel Demand</td><td>Chapter 3 contains a methodology discussion of all processes except for the assignment of traffic and adjustments to intersections. What is the methodology for assigning future traffic paths to the network? Was the 15 percent adjustment made in future year traffic forecasts or was it only assumed in the existing conditions?</td></tr>
<tr><td>A-18</td><td>Chapter 4: Transportation Impacts</td><td>Table 4-1 indicates that Doyle Drive access is to provide the capacity of between 599 and 1,045 PM peak hour trips. However, no new intersections were studied to analyze the impact of this new traffic. If access is included, then an analysis of intersection operations should be included. If Doyle Drive access is not provided, will additional intersections operate at deficient levels of service?</td></tr>
<tr><td>A-19</td><td>Chapter 4: Transportation Impacts</td><td>Table 4-1 indicates that Presidio Avenue PM peak hour two-way traffic would exceed 1,900 vehicles for most alternatives. Other roadways (Lincoln Boulevard and Arguello Boulevard) are expected to have over 1,500 two-way vehicles during the PM peak hour. The discussion should include any link capacity problems. As low-speed urban streets, these roadways may approach or exceed capacity. What is the quantifiable effect of adding so much traffic to these streets? Will this pose a danger to bicyclists?</td></tr>
</table>

Comment Number	Chapter Reference	Comment
A-20	Chapter 4: Transportation Impacts	Given the anticipated increases of traffic expected on Presidio Avenue, Arguello Boulevard and Lincoln Boulevard, other intersections will be affected besides those adjacent to the Presidio. What are the impacts of the traffic increase on other intersections? If signals and/or additional turn lanes would be required at the initial intersections on these facilities, would there be an impact to other nearby intersections that do not have the same number of lanes or signals?
A-21	Chapter 4: Transportation Impacts	The report does not detail the parking requirements for tour buses. Will tour buses be able to park in the Presidio? If so, what is the impact on parking? IF not, where will tour buses park and what local streets would tour buses likely use to access this non-Presidio parking?
A-22	Chapter 4: Transportation Impacts	The report does not discuss how the increased traffic on streets that are used by Muni and Golden Gate Transit buses will affect the travel times and reliability of those operations. In particular, the additional traffic on facilities that have one lane in each direction (such as Presidio Avenue, Lombard Street and Lincoln Boulevard) would have an effect on transit travel times. What is the impact of the PTIP alternatives on local transit travel times and operational productivity? Please quantify expected increases in transit operating costs resulting from increased travel times.

6. DIRECTORY OF RESPONSES TO COMMENTS

6. DIRECTORY OF RESPONSES TO COMMENTS

This section lists the names of parties that made comments on the Draft EIS and provides a directory of where each submitter's individual comments are responded to in the document. All responses are coded to 34 specific response topics (e.g., Biological Resources, code "BR") and to specific comments and responses within a topic. For example, Biological Resources comments are organized into 14 general issues, coded BR-1 through BR-14 and the response to one or more comments on that issue follows a brief comment summary. (Response BR-3 immediately follows the comment summary for BR-3). In the directory, all comments are indicated by topic code (a two-letter code) and issue (e.g., BR-3, PN-1, FI-4). The number in parentheses immediately following the commentor's name is the specific topic code and issue where the comment and response can be found. The number after the topic code is the page number where the topic code and issue are located. The directory only refers to the principal points raised by commentors. Commentors are encouraged to review other responses that may also provide information and guidance.

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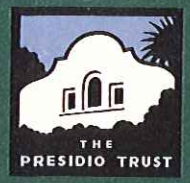
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